

Minnesota

Campaign Finance and Public Disclosure Board Meeting

Monday, May 11, 2026
1:00 PM
Room 2000 (Skjegstad Conference Room)
Stassen Building

REGULAR SESSION AGENDA

1. **Approval of minutes**
 - A. April 1, 2026
2. **Chair's report**
 - A. Meeting schedule
3. **Executive director's report – no written materials**
4. **Enforcement report**
5. **Advisory Opinion 471 – disclosure of contributions from federal committee to a committee registered with the Board**
6. **Orders on IFP motions regarding Court of Appeals case nos. A26-0652, A26-0653, and A26-0654**
7. **Legal report**
8. **Other business**

EXECUTIVE SESSION
Immediately following regular session

**STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

.....
**Wednesday, April 1, 2026
1:00 P.M.**

**Room 2000 (Skjegstad Conference Room)
Stassen Building**

.....
REGULAR SESSION

MINUTES

The meeting was called to order by Chair Asp.

Members present: Asp, Banaian, Flynn, Rashid, Spevacek, Swanson (remote)

Others present: Sigurdson, Engelhardt, Olson, Lohse, staff; Hartshorn, counsel

MINUTES (March 12, 2026)

The following motion was made:

Member Flynn's motion: To approve the March 12, 2026, minutes as drafted.

Vote on motion: Unanimously approved.

CHAIR'S REPORT

Mr. Sigurdson noted the May 11th meeting will occur on a Monday as the Stassen Room was not available at all on Wednesday of that week, and asked members to advise whether a morning or afternoon time would work best for their schedules.

EXECUTIVE DIRECTOR'S REPORT

Mr. Sigurdson presented a memorandum that is attached to these minutes. He provided an update on the disclosure provided on the annual Lobbyist Principal Reports, and reviewed recent legislative actions. Chair Asp asked if the opinion of the Board had been requested on any of the bills, and Mr. Sigurdson said no official requests had been received. Member Swanson inquired about enforcement authority should local public officials be required to file economic interest statements as proposed. Mr. Sigurdson stated the collection and maintenance of the reports would be at the local level but a failure to file a report would be referred to Board staff for enforcement.

ENFORCEMENT REPORT

A. Waiver Requests

Chair Asp asked the Board to consider waiver requests 1-7 as a group.

The following motion was made:

Member Rashid's motion: To approve waiver requests 1-7, as recommended.

Vote on motion: Unanimously approved.

1. CTUL Action Fund Political Committee (41403)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
Underlying Disclosure	2/2/2026	3/4/2026	\$1,000 LFF	No	Waive
Executive Director Briana Kemp states the violation occurred because of a misunderstanding of the contribution threshold. CTUL believed the \$5000 threshold applied to a discreet contribution from a donor but now understands it is an aggregate \$5000 threshold for a reporting period from a donor.					

2. Orvin Gronseth					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/9/2026	\$100 LFF	No	Waive
Mr. Gronseth was managing ongoing health issues during the reporting period which delayed the filing of his report.					

3. Tom Roeschlein					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/16/2026	\$100 LFF \$1,000 CP	No	Waive
Mr. Roeschlein was managing ongoing health issues during the reporting period which delayed the filing of his report.					

4. Stephanie Revering					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/12/2026	\$100 LFF \$1,000 CP	No	Waive
Ms. Revering states she was unaware that a final Economic Interest Statement was required following her departure from the Board of Peace Officers Standards and Training. She also failed to receive the multiple reminders from board staff regarding the required filing as her account contact information was all tied to her former employer, which she left in mid-2025 and they did not forward to her. Ms. Revering filed as soon as she received notice that she needed to file.					

5. Jon Lundberg					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/6/2026	\$95 LFF	No	Waive
Mr. Lundberg states that he believed the because his tenure on the Board of Executive for Long Term Care Supports and Services had ended in 2025 that he was not required to file a report. He was also out of the country and did not have access to his email or mail.					

6. Jacqueline Olson					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/9/2026	\$100 LFF	No	Waive
Ms. Olson states she left her role at the Dept. of Commerce in November of 2025 but did not receive any reminders to file a final annual report. Records indicate she received a notification to file on 12/15/2025 but did not receive additional notices until 3/9/2026.					

7. Elizabeth Frosch Taylor					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/24/2026	\$100 LFF \$1,000 CP	No	Waive
Ms. Frosch Taylor states she did not receive any reminders to file a final economic interest statement until 3/20/2026 despite leaving state service on 6/10/2025. Board records indicate that, upon learning of her departure, a termination letter was mailed 8/10/2025 to the address on file. The address was the previous address for DEED and the letter was not received. Subsequent notices were not received as the only email address on file was her former DEED address.					

Chair Asp asked Board staff for more information why they were recommending no action on Mr. Rafferty's waiver request. Mr. Sigurdson noted Mr. Rafferty's previous waiver request in 2017 cited the exact same explanation. Mr. Olson further noted an outstanding \$5 late filing fee associated with his Annual EIS due in 2018. Chair Asp opened the floor to motions and none was made.

8. Rob Rafferty					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/9/2026	\$100 LFF	Yes, \$5 LFF waived in 2017	No Action
Mr. Rafferty states he is seeking a waiver as his time on the Vadnais Lakes Area WMO has been entirely uncompensated for the duration of his service. He cited the same rationale in requesting a waiver in 2017 and owes an additional \$5 LFF for his 2017 annual EIS.					

B. Payments

1. Forwarded anonymous contributions

Heaser (Jason) for House 34 - \$100

2. Civil Penalty for aggregate special source violation

Friends for Ethan (Cha) - \$100

Clardy (Mary Frances) for House - \$200

3. Late filing fee for 2025 annual economic interest statement

Curt Ballard - \$20

Rori Coleman-Woods - \$20 (still owes \$55)

Lynette How - \$40

Richard Miller - \$70

Mike White - \$20 (still owes \$55)

4. Late filing fee for 2025 pre-general report

Excellence Minnesota - \$100

5. Late filing fee for 2025 year-end report

Mark Bartusek for Senate - \$25

Cha (Ethan) Senate - \$125

CTUL Action Fund Political Committee - \$25

DFL Disability Caucus - \$100
Kathy (Jorgenson-Hegstad) 4 House - \$25
Kittson County RPM - \$100
Maroon & Gold Political Action Committee - \$125
MCCL State Victory Fund - \$150

6. Late filing fee for 2025 June lobbyist report

Taylor Jamison - \$75

7. Late filing fee for 2022 lobbyist principal report

Electric Wind LLC - \$25
MN Workers Memorial Trust - \$25

EXECUTIVE SESSION

Chair Asp recessed the regular session of the meeting and called to order the executive session. Regular session was reconvened and Chair Asp reported the findings made in the matter of a complaint regarding Actify.

LEGAL REPORT

Mr. Hartshorn provided members with an update on pleadings and service of process for various matters previously advanced to the Office of the Attorney General.

There being no other business, the meeting was adjourned by Chair Asp.

Respectfully submitted,



Jeff Sigurdson
Executive Director

Attachments:
Executive Director's report
Legal report



MINNESOTA

CAMPAIGN FINANCE BOARD

Board Meeting Dates for Calendar Year 2026

Meetings are typically held the first Wednesday of each month at 10:00 AM, unless otherwise noted.

Wednesday, June 3

Wednesday, July 1

Wednesday, August 5

Wednesday, September 2

Wednesday, October 7

Wednesday, November 4

Wednesday, December 2



MINNESOTA CAMPAIGN FINANCE BOARD

Date: May 4, 2026

To: Board members
Counsel Hartshorn

From: Alexis Lohse, Legal/Management Analyst
Megan Engelhardt, Assistant Executive Director

Telephone: 651-539-1183

Telephone: 651-539-1182

Subject: Enforcement report for consideration at the May 11, 2026, Board meeting

A. Discussion Items

1. Balance Adjustment Request – Volunteers for Phyllis Kahn (10054)

The Kahn committee's reported 2020 ending cash balance was \$2,720.62. Both the candidate and the treasurer had health issues that prohibited them from filing the year-end reports for 2021, 2022, 2023, 2024, and 2025 until recently (see waiver request). In 2025, Miriam Cisternas contacted the Board to resolve issues with the Kahn committee. Ms. Cisternas is the daughter of Florence Littman, who is the treasurer of record for the committee. Ms. Cisternas has power-of-attorney for Ms. Littman. Ms. Cisternas was able to obtain bank records for the Kahn committee back to 2024. The bank records showed that the bank account had \$1,032.40 in 2024. Board staff assisted Ms. Cisternas in filing the outstanding reports with the Board, all of which are no-change statements, and Ms. Cisternas sent the remaining funds to the Board to be applied to late filing fees incurred by the Kahn committee. The Kahn committee is requesting a negative adjustment of \$1,688.22 to the committee's 2026 beginning cash balance. If granted, the committee will file a 2026 year-end report that shows the remaining funds being paid to the State of Minnesota for the late filing fees. The 2026 year-end report will be a termination report. If the Board grants the balance adjustment, the 2026 beginning cash balance will be \$1,032.40.

B. Waiver Requests

1. Volunteers for Phyllis Kahn (10054)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2021 Year-End Report	1/31/2022	4/16/2026	\$1,000 CP	No	Waive
2021 Year-End Report	1/31/2022		\$842.60 LFF		
2022 Year-End Report	1/31/2023		\$1,000 LFF		
2023 Year-End Report	1/31/2024		\$1,000 LFF		
2024 Year-End Report	1/31/2025		\$1,000 LFF		
2025 Year-End Report	2/2/2026		\$1,000 LFF		

Miriam Cisternas is the daughter of Florence Littman, who served as former Representative Kahn's treasurer for many years. Ms. Cisternas states she was granted power of attorney for her mother in November of 2025 due to significant cognitive decline, and only became aware of the delinquent filings while going through her mother's mail in February of this year. Since the issues came to her attention, Ms. Cisternas has undertaken to settle existing matters and close accounts associated with the Kahn Committee, as former Representative Kahn is also not able to manage such affairs. The available remaining \$1,032.40 in funds were used towards late filing fees for the the 2020 and part of the 2021 year-end reports. She intends to terminate the committee upon resolution of these matters.

2. NJ Lotto, LLC (8041)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual Lobbyist Principal Report	3/16/2026	4/2/2026	\$325 LFF	No	Waive

Administration Manager Andrea Retana states the late filing of the required report was due to an unexpected confluence of staffing issues. While she was on medical leave, the party responsible for covering Ms. Retana's duties was terminated and this task fell through the cracks. Upon her return, Ms. Retana promptly corrected for this oversight, filing both the overdue report and initiating improved internal controls to prevent future late filings. The organization's two lobbyists terminated in mid-2025 so it is no longer a principal.

3. MN Mobile Resuscitation Consortium (7882)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual Lobbyist Principal Report	3/16/2026	3/20/2026	\$100 LFF	No	Waive

Program Director Kim Harkins states she misunderstood the reporting requirements for lobbyist principals following the termination of their registered lobbyists. The final lobbyist terminated on January 1, 2025 which technically indicated a single day of activity that had to be reported by the lobbyist principal on their 2025 annual report. If the lobbyist had terminated December 31 2024, or earlier the principal report would have not been required.

4. Levi Novacek (Roseau County Commissioner)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/20/2026	\$85 LFF	No	Waive
Mr. Novacek states he was managing multiple health, professional, and personal challenges during the last half of 2025. His failure to timely file his 2025 Annual report was due to these various challenges.					

5. Aaron Schweiger for Minnesota House Campaign (19421)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
Next Business Day Contribution from Candidate	4/1/2026	4/7/2026	\$200 LFF	No	Waive
Treasurer Kandise Garrison states she worked with CFB staff to ensure the proper documentation for personal contributions was reported. When Ms. Garrison received a campaign contribution from the candidate just before the Easter holiday weekend, she made sure to add the contribution to CFRO, but realized later there was probably a reporting form required. She reached out to CFB staff again and was provided with the correct form for this new requirement. The completed form was promptly submitted. This is a new reporting requirement as of 2026 and a compliance warning prompting users to file such reports was not added to CFRO until 4/8/2026.					

6. Mary J Murphy for MN State House of Representatives (19129)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2024 Year-End Report	1/31/2025	2/27/2025	\$450 LFF	No	Waive \$450
2025 Year-End Report	2/2/2026	2/4/2026	\$50 LFF		
Treasurer Rebecca Strand states the 2024 filing was delayed due to inconsistent postal delivery following multiple moves within the final six months of the year, and lack of internet access within the same time frame. Ms. Strand was delayed in filing the 2025 report due to the prolonged illness and subsequent passing of a close family member for whom she was caretaker. The 2025 year-end report was a no-change statement. The committee's cash balance was \$10,005 as of 12/31/2025.					

7. Vote Juli (Servatius) (19309)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Year-End Report	2/23/2026	3/24/2026	\$1,000 LFF	No	Waive \$700
Ms. Servatius was a first-time candidate and served as her own treasurer, an undertaking she realizes was more work than she anticipated. During the reporting period, Ms. Servatius was managing multiple personal issues with her family. Ms. Servatius acknowledges the significant resources and support made available on the CFB website and will utilize them going forward. The committee's cash balance was \$369 as of 2/11/2026.					

8. Campaign Fund of John Krhin for Governor (19304)

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
Next Business Day Contribution from Candidate	3/10/2026 4/1/2026	4/11/2026	\$1,000 LFF \$350 LFF	No	Waive \$1,000

Candidate Krhin stated the late filings were due to the treasurer being unaware of a new reporting requirement for large contributions from candidates, which went into effect in 2026. Both reports have been filed, and the committee's cash balance as of 3/31/2026 was \$5,834.

9. Yellow Medicine County RPM (20235)

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Year-End Report 2023 Year-End Report	2/2/2026 1/31/2024	2/9/2026 2/1/2024	\$125 LFF \$25 LFF	Yes, \$300 LFF for the 2011 Pre-Primary Report	Waive \$125

Treasurer Bill Kamrath states that his father was previously the treasurer for the BPOU but he struggles with technology and is not able to use CFRO. Mr. Kamarath has stepped into the role of treasurer. The party unit has previously paid \$250 associated with late reports filed in 2008 and in 2010. The 2025 year-end report was a no change statement and listed a cash balance of \$617.

10. John Finney (Joe River WD)

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/20/2026	\$100 LFF \$1,000 CP	Yes, \$90 late filing fee for his 2017 Annual EIS	Waive \$1,000 civil penalty

Mr. Finney stated he missed the deadline for filing due to the busy time around the holidays and the transition to their winter home in Florida. He asserts he has diligently filed previous reports on time. He believed he had filed this report but had failed to hit the submit button at the end of the process.

11. Jacob Foslien (Minnesota State High School League)

Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual EIS	1/26/2026	3/20/2026	\$100 LFF \$1,000 CP	No	Waive \$1,000 civil penalty

Mr. Foslien stated that, as a new public official, he did not understand the requirement to file a report even when he had none of the reportable economic interests. He now understands the requirements of the program and will file future reports in a timely and complete manner.

12. Innovative Power Systems (7321)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual Lobbyist Principal Report	3/16/2026	4/16/2026	\$550 LFF	No	Waive \$450
Contact Laura Cina states the organization was unaware there was still an active lobbyist registration as they asked him to terminated. The lobbyist has now been terminated. The 2025 lobbyist principal report was the last report required to be filed for Innovative Power Systems. The principal and its lobbyists filed reports collectively stating that no lobbying activity has occurred since 2020.					

13. Complex Product Manufacturers Coalition (8630)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual Lobbyist Principal Report	3/16/2026	3/21/2026	\$100 LFF	No	Waive \$50
Attorney Martha Marrapese states that the organization no longer employs the person who had been the registered lobbyist, and the notices did not reach anyone currently with the organization. Upon receiving notice via a phone call, Ms. Marrapese filed the outstanding report and registered herself as the lobbyist for the organization.					

14. UpStart (8388)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual Lobbyist Principal Report	3/16/2026	3/20/2026	\$100 LFF	No	Waive \$50
Government Relations Manager Gilberto Soria Mendoza states the organization had no lobbying activity in 2026 (Note: he likely means 2025) and were unaware of the need to file a report.					

15. Minneapolis For the Many (8582)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Annual Lobbyist Principal Report	3/16/2026	4/6/2026	\$375 LFF	No	Waive \$275
Luke Mielke states the failure to file a timely report was due to a misunderstanding of the reporting requirements for lobbyist principals once their sole lobbyist terminated effective as of the end of 2025. Mr. Mielke states this was the organization's first foray into lobbying and they registered out of an abundance of caution. As soon as they received notice of their overdue report, they completed the requirement.					

16. Saint Croix Valley Riders Motorcycle Rights Organization (30747)					
Report(s)	Due	Filed	Amount	Prior Waivers	Recommended Action
2025 Year-End Report	2/2/2026	2/18/2026	\$775 LFF	No	Waive \$525
<p>Treasurer Jozette Born states her acceptance of the role as treasurer did not come with adequate guidance or training. While she managed to timely file reports for 2024, she was under the impression that because the committee did not need to file quarterly reports or pre-election reports in 2025, that a year-end report was also not required. She had, nonetheless, maintained records of receipts and expenditures and was able to file the required report as soon as she became aware of the issue. She is committed to filing all future reports accurately and on time. The fund's cash balance was \$0 as of 3/31/2026.</p>					

C. Payments

1. Forwarded anonymous contributions

Carver County RPM - \$50

2. Civil penalty for failure to register

Lakers4Change - \$225

3. Late filing fee for 2025 annual economic interest statement

Tom Muller - \$40
 Paula Pentel - \$45
 Whitney Place - \$100
 Joseph Plaetz - \$40
 Orrin Okeson - \$40
 Wayne Rotz - \$35

4. Late filing fee for 2020 year-end report

Volunteers for Phyllis Kahn - \$875

5. Late filing fee for 2021 year-end report

Volunteers for Phyllis Kahn - \$157.40 (\$842.60 remaining)

6. Late filing fee for 2025 pre-general large contribution notice

MEA PAC - \$250
 Vote Yes Roseville - \$200

7. Late filing fee for 2025 year-end report

7th Congressional District DFL - \$25

Citizens for Raleigh (Donald) - \$175
JIIVE - \$100
MOHPA PAC - \$350
Olmsted County RPM - \$150

8. Late filing fee for 2024 lobbyist principal report

Kyros - \$1,000
Consumer Action Network, Inc. - \$25
MN United Football Club - \$25

9. Late filing fee for 2025 lobbyist principal report

30,000 Feet - \$25
American Recyclable Plastic Bag Alliance - \$75
Assd General Contractors of MN - \$25
Consumer Action Network, Inc. - \$50
Equaspace - \$25
Minneapolis Downtown Council - \$25
MN Tech Assn - \$25
North Suburbs Communications Commission - \$100
Northern Diversified Solutions LLC - \$50
Nothing But Hemp LLC - \$175
Partnership on Waste and Energy - \$100
Perduco Ventures LLC - \$150
Pillsbury United Communities - \$25
Upper Red Lake Area Association - \$25

Volunteers for Phyllis Kahn (10054)

From: Miriam Cisternas <miriam@mgcdata.com>
Sent: Sunday, April 19, 2026 11:23 AM
To: Engelhardt, Megan (CFB)
Subject: Re: Request for Waiver of Late Fees and Guidance – Volunteers for Phyllis Kahn--additional followup

Dear Ms. Engelhardt,

I am writing regarding the February 19 notice assessing late filing fees for failure to file the 2025 year-end report for the committee of Phyllis Kahn, #10054.

The committee's treasurer is my mother, Florence Littman, who is 86 years old and currently in hospice care. She was the caretaker of my father, who lived for many years with dementia and died under very trying circumstances at the beginning of the pandemic. Soon after that, she developed severe health issues of her own and has been unable to manage compliance matters for many years due to her serious and ongoing medical conditions, including severe cognitive decline. I took over her finances in November 2025 and only discovered this issue at the beginning of March when reviewing her postal mail.

Given these extraordinary circumstances, I respectfully request that the board consider a waiver of penalties and balance adjustment for the Phyllis Kahn committee.

Respectfully,

Miriam Cisternas,

Daughter and POA for Florence Littman, former treasurer for Phyllis Kahn committee.

miriam@mgcdata.com

760 390 9790

NJ Lotto, LLC (8041)

From: Andrea Retana <Andrear@thelotter.com>
Sent: Monday, April 20, 2026 2:24 PM
To: Engelhardt, Megan (CFB)
Cc: Jessica Griggs
Subject: Request for Waiver of Late Fee
Attachments: 04-20-26 - NJ - Regular Mail - NJ Lotto LLC.pdf

Hi Megan,

I hope this message finds you well.

I am writing to respectfully request a waiver of the late fee associated with our recent filing. The delay was due to circumstances beyond our immediate control. I was on maternity leave and returned to work on April 1. During my absence, the General Manager who had been responsible for overseeing these compliance obligations was terminated, which resulted in an unintended lapse in coverage for this task.

Upon my return, I promptly identified and addressed the outstanding matter to bring us back into compliance as quickly as possible. We take our reporting obligations seriously and have since implemented additional internal controls to ensure continuity and prevent similar issues in the future.

Given these circumstances, I kindly ask that you consider waiving the late fee. I appreciate your time and consideration, and I am happy to provide any additional information if needed.

Thank you for your understanding.

Andrea Retana-Chernick

Administration Manager

Mobile: +1 (732) 832-5517

Email: andrear@thelotter.com



Confidentiality Notice: This email and any attachments are confidential and intended solely for the addressee. If received in error, please notify the sender immediately and delete this message.

MN Mobile Resuscitation Consortium (7882)

From: Kim Harkins <kimh07@umn.edu>
Sent: Tuesday, April 14, 2026 8:42 AM
To: Engelhardt, Megan (CFB)
Subject: Request for waiver of late fees for Lobbyist Principal Report Filing

I respectfully request that the board review this waiver and grant an exception for the late fee. We discontinued the use of a lobbyist in 2024 and anticipated that we had completed all forms. When the notice was received, I checked my dates and assumed that it had been in error. When the letter arrived by mail which was somewhat delayed due to a mail mix up; I reached out to the offices to understand why another year of reporting was required. It was only then that I was informed that the lobbyist we had hired submitted their discontinued service to our program on January 1, 2025. This showed one day of lobbyist reporting that was due, clearly with no activity. The non-profit that had engaged the lobbyist is now dissolved. Any funds for this late fee would need to be processed through the University of Minnesota Center for Resuscitation Medicine, which will be complicated.

I appreciate your consideration of this matter.

Sincerely,

Kim Harkins, MPH

Program Director, Center for Resuscitation Medicine, University of Minnesota
and MN Mobile Resuscitation Consortium (MMRC)

Cell 612-965-4461

kimh07@umn.edu

Center for Resuscitation Medicine crm.umn.edu

Levi Novacek

From: Levi M. Novacek <levi.novacek@co.roseau.mn.us>
Sent: Tuesday, April 7, 2026 3:41 PM
To: Engelhardt, Megan (CFB); Levi M. Novacek
Cc: Lohse, Alexis (CFB)
Subject: Re: Economic interest statement

Minnesota Campaign Finance Board,

Please waive fees and penalties in regard to my late filing of economic interest statement. I have been dealing with health issues since summer of 2025, and in October of 2025, had a procedure done to remove a renal mass off my right kidney. Due to check up appointments out of town, a full time small grains farmer, and a divorce in 2025 as well, my Economic Interest Statement was over looked. If you would like documentation please advise. Thank you for your time on this matter.

Levi M Novacek
7013671803

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Aaron Schweiger for Minnesota House Campaign (19421)

Date April 7, 2026

To Campaign Finance and Public Disclosure Board

From Kandise Garrison, Treasurer - Aaron Schweiger for MN House Campaign, 19421

Re Report of Large Personal Contribution

I am writing to request a waiver for late filing of the 2026 Large Candidate Contribution Notice. On March 2, 2026, I inquired of Megan Engelhardt about the rules for personal candidate contributions exceeding \$5000 and she indicated this was acceptable if the candidate had not signed the public subsidy. She also informed me that there was a new rule that these contributions must be reported to the CFB within 24 hours.

On March 31, 2026, I received a personal check from Mr. Schweiger for \$25,000. I promptly entered that into the software and banked it on 4/1 before I left for the Easter break. I totally forgot about the need to file a form. When I returned from the weekend, I remembered that Megan had mentioned reporting. I looked in the software but did not find an applicable form. I went back to my email from the prior month and again contacted Megan.

Megan kindly sent me the form and I returned it to her. I am aware that there is a fine for filing past 24 hours. I am requesting that the fine be waived as this is a new form and my first time filing it, though I have been a campaign treasurer for many years.

Thank you for your consideration of waiving the fine. I am now aware of this and will certainly file in a timely manner in the future!

Regards,

Kandise Garrison

Mary J Murphy for MN House of Representatives (19129)

From: Rebecca Strand <RStrand257@outlook.com>
Sent: Friday, March 27, 2026 11:05 AM
To: Engelhardt, Megan (CFB)
Subject: Re: CFB Issue with public subsidy payment and late filing fees.

Megan,

I am requesting a waiver on the filing late fees for 2024 and 2025. I moved in mid 2024 from my address listed on the campaign form and once again at the end of 2024. The first move I was receiving the letters from the campaign board but when I moved in December, I found out that my mail was not being sent to my new address after about two months of not receiving anything from my old address. I also did not have internet access for my email account during this time. I had filed my change of address timely both times and still no one at the post office could answer why my mail was not being updated after the second move.

For the 2025 filing, my mom died in January 2026 after being ill for six months. I was and still am tasked with cleaning her home for selling and handing her financial affairs. Her home is located in rural Wisconsin and does not have internet access. I spent most of January and February at her home as my home is 300 miles away.

Sincerely,

Rebecca Strand
651-497-7994

Vote Juli (Servatius) (19309)

From: Juli Servatius <servatiusjuli@gmail.com>
Sent: Tuesday, March 24, 2026 9:42 AM
To: Engelhardt, Megan (CFB); Lohse, Alexis (CFB)
Subject: Waiver request
Mx Engelhardt and Mx Lohse -

Thank you in advance for submitting my waiver request to reduce or waive the late fees on the final report in the CFRO.

And to the Finance Board: thank you in advance for considering my request.

"Good Cause" Reasons by Category:

Category: Organization

- I wish I would have made a google bookmark to the CFRO site - and I made room for it in the bookmarks bar so I never had to panic that I couldn't find the site and make the incorrect assumption I couldn't get into it. I WILL do that the next time I run for office.
- I wish I would taken better advantage of the online, video and and paper document resources given to me by your office. I wish I would have taken more time with them.
- I wish I would have made 2 entries in my calendar for each deadline, especially this final one. What works for me is a 1st entry to denote that the deadline was coming up in 3 days and then a 2nd entry was the actual deadline. This type of calendaring practice has been effective for me in remember, say, therapy appts.
- I wish I had been able to comply with the reasonable rules you guys have in place. And I mean that. From where I'm sitting, the campaign finance board looks well run. And you guys were kind to response to my late minute applications.

Category: Personal Life

To say I bit off more than I could chew when I opened a campaign and ran for office is an understatement. I was already drinking from a fire hose with the projects I had going on (my small business, charitable work, parenting) and then to add a run for office into the mix was kind nuts. And it was all too last minute. But it was a wonderful experience and I am contemplating running again, only this time I hope to make the organizational changes outlined above.

I didn't factor in the personal life detours that always seem to come up: My 3 young adult children who aren't quite adulting yet, my aging mother, who had a medical procedure last week, and the mental and physical health circumstances I myself am in.

Category: Amends and Gratitude

- If I run again or even if I don't, I plan to talk about how well run your organization and the SOS organization are. What good people are in place! I had a good experience running for office in Minnesota. I don't know how it goes for candidates in other states, but it goes well here. Andrew Olson consistently emails back in less than 24 hours, Anthony and Julian over at the Secretary of State's office answer the phone and reply carefully and thoughtfully to my questions. And both organizations send back well written emails full of hyperlinks to the applicable MN statue and to applicable information online.

I'm involved with the Forward Party now and am helping them work with both of your organizations. At every chance I get, I tell the story of how responsive and helpful your 2 organizations are. There shouldn't be this underlying suspicion of state government.

Please waive my fees. They are huge by this point. I filed late. The fees were known to me in February. It was wrong of me not to file on time. I am sorry I did not file on time.

Juli Servatius
651-206-9034

Campaign Fund of John Krhin for Governor (19304)

From: John Krhin <krhin4gov@gmail.com>
Sent: Wednesday, April 29, 2026 10:03 AM
To: Engelhardt, Megan (CFB)
Cc: Lohse, Alexis (CFB)
Subject: late filing fee

Megan or Alexis,

Per Andrew Olson's instructions, my campaign is requesting that the late filing fees associated with 3/9 and 3/31 contributions that were not properly reported be waived.

As diligent as our treasurer is, the MN Statute requiring the respective reporting was missed. I believe that Becky Reine has now filed the proper report(s) and is monitoring ongoing contributions in accordance with reporting requirements. In addition, as our campaign is now on the road almost continually, our mail is being monitored only weekly, at best. I don't believe we have received an invoice for the fee. I assume that, if it is waived, there is no further necessary action on our end. Please advise.

Respectfully,

John Krhin

218-590-4759

krhin4gov.com

Yellow Medicine County RPM (20235)

From: William Kamrath <william@waterbillboards.com>
Sent: Thursday, April 9, 2026 9:52 AM
To: Engelhardt, Megan (CFB)

I am writing you today requesting a reduction or waiver of the fee that Yellow Medicine County RPM owes. The reason we were not filed in time was that my father, Randy Kamrath, used to be the Treasurer. In his old age, he is not good with technology and would have kept doing the job if he could send it in the mail, as he did for years. But with switching everything to online, he did not understand how to do it. That is why I have taken over for him to end the term. I would really appreciate it if you could help us, as we are a small BPOU, and \$125 is a lot of money for us, and we could use it to help our county and the people running in the election.

thank you for your time and thought on this matter

--

Bill Kamrath
Production Manager/Shipping&Receiving
Office: (507)-223-7133
Direct Line: (507)-223-7137
Cell: (507)-829-8979
William@waterbillboards.com

John Finney

April 2026

Minnesota Campaign Finance Board

To whom it may concern,

Please accept my humble apology for being extremely late in filing my 2025 campaign finance disclosure, and ask that you relieve me of any financial obligations due to my tardiness.

I offer up no excuse other than in the commotion surrounding the Christmas holidays, preparing to travel to our winter home in Florida, and perhaps being 75 years old. It somehow slipped my mind. If you review my past record of submissions, you will find that I have been diligent in reporting to your organization since the inception of this requirement.

The closest that I come to being involved in any type of lobbying effort is being a member of the Red River Watershed Management Board which hires a firm to carry its requests for project and program funding to the Minnesota Legislature. I live more than 400 miles from St. Paul and have not been as the State Capitol for a number of years.

When I finally did fill out the campaign finance form and in speaking with Ms Lohse, it is apparent that I did not push the submit button for the application.

Thank you for your consideration in this matter.

Sincerely yours

John N. Finney

St. Vincent, Minnesota

Jacob Foslien

Dear Minnesota State Campaign Finance and Public Disclosure Board:

I am writing to ask for my late fees and civil penalty to be waived on my late filing of my Statement of Economic Interest. I emailed my completed form to Alexis Lohse on the evening of March 20th, 2026.

This is my first time completing this document as I have never had to complete one before. When I first viewed the document, I knew I didn't have anything under any of these categories, so I mistakenly thought I did not need file this document.

I did receive emails and certified copy of the document in the mail this winter and I still felt the same way. Granted I failed to ask questions or contact your department and probably should have, but I honestly thought this did not apply to me. I recognized that I am on a public board, but again I had nothing for the categories so again I felt I did not need to complete this.

However, upon receiving an email on Friday March 20, 2026, regarding late fees and a civil penalty; I realized I had made a very big mistake.

I acknowledge my mistake and that my ignorance has put me in this position, but I am asking for my late fees and civil penalties to be waived. I should have been more on top of this. I have spoken to MSHSL Executive Director Erich Martens about this, and he is aware of my reasons why I filed late as well as he knows I am submitting this letter. Please understand my situation.

I can assure you that this will not happen again. Thank you for understanding.

Sincerely,

Jacob Foslien

Innovative Power Systems (7321)

From: Laura Cina <laura.m.cina@gmail.com>
Sent: Monday, April 27, 2026 3:45 PM
To: Engelhardt, Megan (CFB)
Cc: Ralph Jacobson
Subject: Fee for late report

Hello,

We would like to request the Minnesota State Campaign Finance and Public Disclosure Board to please waive the fee for the late financial lobbying report. We, as in the people that work at Innovative Power Systems, were not aware of anyone lobbying for us in the last few years. Also, if it matters, we do not plan on doing any lobbying in the future.

Sorry for this misunderstanding,
Laura Cina
Innovative Power Systems
612-963-4757

Complex Products Manufacturer's Coalition (8630)

From: Marrapese, Martha <MMarrapese@wiley.law>
Sent: Monday, April 20, 2026 5:01 PM
To: Engelhardt, Megan (CFB)
Subject: Request for waiver of late filing fee

Dear Ms. Engelhardt:

I am writing to ask for a waiver of the late fee in response to the notice I received dated March 27, 2026 for the CPMC's Lobbyist Principal Report. We were not aware that this registration existed or the need for a report. CPMC did not receive any notification in advance of the deadline in the form of a reminder.

I think this was because the individual who was registered left the organization last year, so the contact information was an out of date. Similarly, the only other person who might have received these notices is not someone CPMC works with directly at this point in time so the reminders did not make their way to me.

As soon as I was contacted by phone (I am not sure how you found me but I am glad you did), I filled out the report promptly and I have become registered as CPMC's Lobbyist Principal. CPMC is a new and small group with a modest budget and we would appreciate the waiver. There was no intent to be delayed and we respect and appreciate your attention to ensuring these important reports are made in a timely way. We will be sure to do so in the future and have taken steps to avoid a reoccurrence.

Sincerely, Martha Marrapese



Martha E. Marrapese
Attorney at Law
mmarrapese@wiley.law

Wiley Rein LLP • 2050 M Street NW • Washington, DC 20036
o: 202.719.7156
[Download V-Card](#) | wiley.law

CONFIDENTIALITY: This email and any attachments are confidential, except where the email states it can be disclosed, and it may also be privileged. If received in error, please do not disclose the contents to anyone, but notify the sender and delete this email and any attachments.

Upstart (8388)

From: Gilberto Soria Mendoza <gilberto.mendoza@upstart.com>
Sent: Wednesday, April 15, 2026 3:26 PM
To: Engelhardt, Megan (CFB)
Cc: Lor, Ploua (CFB)
Subject: Lobbyist Principal Report -- Upstart -- Fee Waiver Request

Hello Megan,

My name is Gilberto Soria Mendoza. I am emailing to request a fee waiver. Upstart had no lobbying activity in Minnesota in 2026. We were unaware of this requirement and thus missed these notices. We kindly request that the fees be waived. Thank you for your consideration. If there are next steps, please let me know.

Best regards,

Gilberto

Gilberto Soria Mendoza
Manager, Government Relations
www.upstart.com

CONFIDENTIALITY STATEMENT: This electronic message transmission contains information from Upstart Network, Inc. and may be confidential. The information is intended only for the use of the person(s) named above. If you are not the intended recipient, any disclosure, copying, distribution or use of or any other action based on the contents of this information is strictly prohibited. If you received this electronic transmission in error, please delete it from your system and inform the sender of the error.

Minneapolis For the Many (8582)

From: Luke Mielke <lmielke7@gmail.com>
Sent: Monday, April 13, 2026 4:11 PM
To: Engelhardt, Megan (CFB)
Subject: Re: Minneapolis for the Many Lobbyist Principal Report

Hi Megan,

Thanks! I'd like to request a waiver on behalf of Minneapolis for the Many. During 2024 and 2025, Minneapolis for the Many sent several emails that encouraged individuals to contact City Council members around particularly votes. As these emails were drafted by a paid communication staff person, we erred on the side of caution and had that staff person register as a lobbyist, despite never directly spending any money on lobbying. We successfully filed the lobbyist termination in December 2025 and were unaware there was a requirement to submit a principal lobbyist report after terminating because our experience is with operating as a political committee, not lobbying. Because Minneapolis for the Many was in the process of terminating the committee, we were unable to receive emails or calls at the contact info on file about the overdue principal lobbyist report. Immediately upon receipt of mail forwarding of the notice of the overdue principal lobbyist report, the principal lobbyist report was filed. All of campaign finance reports for Minneapolis for the Many from 2023-2026 were filed promptly and on time.

Thanks,
Luke Mielke

Saint Croix Valley Riders Motorcycle Rights Organization (30747)

From: SCVR Treasurer <treasurer@scvr.org>
Sent: Tuesday, April 14, 2026 5:45 PM
To: cf.board@stte.mn.us; Engelhardt, Megan (CFB)
Subject: Receipts and Expenditures late filing

Good day,

I have received notification that we filed our annual report late and have an outstanding fee of \$775. I sincerely apologize for the late filing. I am a volunteer Treasurer for this organization and when I took the position over, no one informed me of the need for this reporting or why we do it.

I muddled my way through figuring it out in 2024 and when I thought I was supposed to do the quarterly report for 2025, the system wouldn't let me enter anything. I reached out to someone there and was told that since it's not an election year, we were not required to do the quarterly reporting. Therefore, I did not complete reports throughout the year. I did, however, track our receipts and expenditures throughout the year for our records.

When I was contacted after the end of 2025 about needing to file this report, I explained that I had been informed we did not need to do this.

I was then corrected and told we, in fact, do need to report. I immediately completed the annual report with figures from our year based on my records. I believe they do match correctly with Bike Pac MN numbers, as well. I returned that report ASAP once I understood the need.

I would sincerely appreciate having the fee waived due to the circumstances. I will make sure it does not happen again. We are a very small non-profit organization, and we really cannot afford to pay a fee like this especially over a misunderstanding.

I hope that the fees will be able to be waived.

Thank you for your consideration and I am available for any additional information you may require to assist in making your decision.

Sincerely,

--

Jozette Born, Treasurer
St. Croix Valley Riders
PO Box 112
St. Paul Park, MN 55071
SCVR.org



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: May 4, 2026

To: Interested Members of the Public

From: Jeff Sigurdson – Executive Director

Telephone: 651-539-1189

Re: Advisory Opinion 471

This advisory opinion request was received on April 6, 2026. The request is from a committee registered with the Federal Elections Commission that intends to make contributions to an independent expenditure committee registered with the Board. The requestor understands that it will need to provide a statement of underlying disclosure for the funds used to make the contributions to the Minnesota independent expenditure committee, and asks specific questions about the disclosure statement.

The requestor does not wish to make the request public. Therefore, the draft opinion that is provided to the public does not identify the requestor. The Board will only discuss the public version of the draft opinion during regular session.

Attachments:

Draft advisory opinion 471 – public version

State of Minnesota
Campaign Finance & Public Disclosure Board
Suite 190, Centennial Building. 658 Cedar Street. St. Paul, MN 55155-1603

**THE FOLLOWING PUBLICATION DOES NOT IDENTIFY THE
REQUESTER OF THE ADVISORY OPINION, WHICH IS NON PUBLIC DATA
under Minn. Stat. § 10A.02, subd. 12(b)**

ADVISORY OPINION 471

SUMMARY

Contributions from a federally registered independent expenditure committee to an independent expenditure committee registered in Minnesota must be accompanied by underlying disclosure statements that contain required information on the source of money used for the contribution.

Facts

As a representative for a political committee registered not registered in Minnesota (the Fund) you ask the Campaign Finance and Public Disclosure Board for an advisory opinion regarding contributions from the Fund to an independent expenditure committee that will be registered with the Board. The request is based on the following facts:

1. The Fund is registered with the Federal Election Commission (FEC) as an independent expenditure-only committee. An independent expenditure-only committee registered with the FEC is commonly referred to as a "Super PAC", because under federal law it may receive contributions from both individuals and corporations, and because there is no limit on the size of the contributions the committee may accept.
2. The Fund intends to make contributions to an independent expenditure committee that will be registered with the Board. The Minnesota independent expenditure committee (MN-IEC) will be formed with its own federal Employer Identification Number, a separate bank account, and will have its own governance structure. All independent expenditures intended to influence Minnesota state and local elections would be made by the MN-IEC.
3. The Fund understands that because it is not registered with the Board it is considered an "unregistered association" and will be required to provide disclosure statements with contributions that the Fund makes to the MN-IEC that exceed certain thresholds, as provided in Minnesota Statutes section 10A.27, subdivision 15.

Issue One

When a Super PAC registered with the FEC makes a contribution to a Minnesota independent expenditure committee and files the required underlying disclosure statement, does that filing satisfy Minnesota's disclosure obligation for the Super PAC in full for that contribution?

Opinion One

Yes. Minnesota Statutes Chapter 10A requires unregistered associations to provide underlying disclosure for certain contributions made to political committees and funds registered with the Board. Because the Fund will be contributing to an independent expenditure committee, it may provide the underlying disclosure statement required by Minnesota Statutes section 10A.27, subdivision 15.¹

The first underlying disclosure statement will be required when the Fund has contributed in aggregate more than \$5,000 to independent expenditure committees or funds registered in Minnesota during a calendar year. After reaching that threshold the Fund will need to provide another statement with each subsequent contribution. The Fund must provide any required disclosure statement to the recipient committee's treasurer at least one day prior to the date that committee's next campaign finance report is due. It is important to note that the MN-IEC must file periodic campaign finance reports disclosing its activity, including contributions received from the Fund, and must provide a copy of the underlying disclosure statement to the Board with the periodic report that first discloses the contribution from the Fund. Failure to provide and file the underlying disclosure statement in a timely manner may result in substantial late fees on both the Fund and the MN-IEC. As a best practice the disclosure statement should be provided to the MN-IEC with the contribution.

Issue Two

The Fund may receive contributions from corporations, and those contributions will in turn be used in part for the contribution to the MN-IEC. Do corporate contributors need to be individually identified on the underlying disclosure statement provided to the MN-IEC? Does the answer depend on whether the corporation donor had reason to know or expect that its contribution would be used to support the MN-IEC?

¹ The underlying disclosure statement required with a contribution to a general-purpose political committee or fund (a committee or fund that may make contributions to candidates) is specified in [Minn. Stat. § 10A.27, subd. 13](#).

Opinion Two

A contribution from a corporation is itemized on the disclosure statement if the corporation has given more than \$5,000 to the Fund, and the corporation specifically authorized that the money be used to make contributions to the MN-IEC that totaled more than \$5,000.²

Additionally, a corporation may need to be itemized as a donor on the disclosure statement in the following two situations. The Fund may pro-rate the contribution to the MN-IEC across all donations it received during the calendar year. If an individual donor's pro-rated portion of that contribution exceeds \$5,000, then that donor must be itemized on the disclosure statement.

Alternatively, the Fund may decide to designate specific donor(s) to the Fund as the source of funds used for the contribution to the MN-IEC. If the amount of the donation from a designated donor that is attributed for the contribution to the MN-IEC exceeds \$5,000, then that designated donor must be itemized on the disclosure statement.

Issue Three

The Fund may receive donations from corporations registered in Minnesota. Do corporations registered in Minnesota have additional registration or reporting requirements with the Board as a result of contributing to the Fund? Does the answer depend on whether the Minnesota corporate donor had reason to know or expect that its contribution would be used to support the MN-IEC?

Opinion Three

No. A corporation registered in Minnesota that contributes to the Fund will not have additional registration or reporting requirements with the Board, regardless of whether the corporation knew or expected that their contribution to the Fund would be used to support the MN-IEC.

Issue Four

Chapter 10A requires associations that receive contributions or make expenditures to influence Minnesota elections to register with the Board. If the Fund makes contributions to a MN-IEC will the Fund be required to register as a political committee with the Board?

Opinion Four

No. As provided in the facts of this opinion all independent expenditures to influence state or local elections will be made by the MN-IEC, which will require the MN-IEC to register and report to the Board. As an unregistered association making contributions to an independent expenditure committee the Fund is required to provide the underlying disclosure statements

² [Minn. Stat. § 10A.27, subd. 15 \(d\) \(1\).](#)

discussed in this advisory opinion, but is not required to register with the Board. Minnesota Statutes section 10A.27, subdivision 15, anticipates the existence of associations that will make contributions to entities registered with the Board well in excess of the registration thresholds found in Chapter 10A.

Issued: May 11, 2026

David Asp, Chair
Campaign Finance and Public Disclosure Board



MINNESOTA

CAMPAIGN FINANCE BOARD

Date: May 4, 2026

To: Board members
Nathan Hartshorn, counsel

From: Andrew Olson, Staff Attorney

Telephone: 651-539-1190

Re: Motions to Proceed In Forma Pauperis - Court of Appeals Case Nos. A26-0652, A26-0653, and A26-0654

In March 2026 the Board received three complaints submitted by Troy Scheffler. The first complaint alleged that the Republican Party of Minnesota violated the disclaimer requirement for campaign material with respect to a website and an email. The second complaint alleged that the Crow Wing County RPM violated the disclaimer requirement for campaign material with respect to an email and documents linked within that email. The third complaint alleged that the Itasca County RPM's 2025 year-end report was incorrect with respect to a contribution to, and partial refund from, a candidate committee, the characterization of an expenditure for billboards as a general expenditure rather than an independent or approved expenditure, and the explanation provided for that expenditure. The third complaint also alleged that the Itasca County RPM's treasurer, Catherine McLynn, falsely certified that party unit's 2025 year-end report as true.

The Board's chair ordered that the full Board make the prima facie determinations for the first and second complaints, which it did on April 1, 2026. The Board dismissed those complaints after determining that the respondents included disclaimers on the alleged campaign material that were substantially in the form provided within Minnesota Statutes section 211B.04.

The Board's chair made a prima facie determination regarding the third complaint on April 2, 2026, and dismissed that complaint after determining that the complaint lacked evidence indicating that the Itasca County RPM's 2025 year-end report failed to comply with the reporting requirements in Minnesota Statutes section 10A.20, subdivision 3, or that its treasurer falsely certified the original or the first amended version of that report as true.

Mr. Scheffler filed three petitions for writs of certiorari with the Court of Appeals on April 14, 2026, seeking judicial review under Minnesota Statutes section 14.63, and writs of certiorari were issued the same day. Mr. Scheffler served the Board with the attached motions and affidavits seeking to proceed *in forma pauperis* (IFP) in the Court of Appeals. IFP status affords a litigant the ability to proceed "without payment of fees, costs, and security for costs" they would otherwise be required to pay. Under Minnesota Rules of Civil Appellate Procedure, Rule 109.02, a motion to proceed IFP in the Court of Appeals must be filed with the trial court. When the decision being appealed was issued by a state agency, the state agency acts as a trial court would and is responsible for ruling on the IFP motion.

IFP status is granted, under Minnesota Statutes section 563.01, subdivision 3, when an “appeal is not of a frivolous nature” and the appeal is brought by an individual who files an affidavit stating they are entitled to redress and are “financially unable to pay the fees, costs and security for costs.” Under paragraph (b) of that subdivision, an individual is presumed to qualify if they are “receiving public assistance described in section 550.37, subdivision 14,” and that statute includes “payment of Medicare part B premiums” within its description of forms of public assistance. An appeal is frivolous if it is brought “without any reasonable basis in law or equity and could not be supported by a good faith argument for a modification or reversal of existing law.”¹

Mr. Scheffler’s core argument in the Republican Party of Minnesota and Crow Wing County RPM matters appears to be that the Board erred in determining that the disclaimers in question were substantially in the form required by Minnesota Statutes section 211B.04. Mr. Scheffler’s core argument in the Itasca County RPM matter appears to be that the Board’s chair erred in determining that the complaint lacked evidence indicating that the Itasca County RPM 1) incorrectly reported a contribution made to a candidate; or 2) incorrectly reported an expense for billboards as a general expenditure, rather than as an independent or approved expenditure. Board staff believes that each appeal raises some issues that are not frivolous.

Mr. Scheffler’s affidavits include evidence that he receives public assistance in the form of payment of Medicare Part B premiums. Therefore, he is presumed to qualify for IFP status if the appeals are not of a frivolous nature. The attached draft orders would grant Mr. Scheffler’s motions for IFP status. Also attached are the prima facie determinations being appealed, the IFP motions and affidavits, and Mr. Scheffler’s statement of the case for each appeal.²

Attachments:

Republican Party of Minnesota prima facie determination (A26-0654)

A26-0654 IFP motion and affidavit

A26-0654 Scheffler statement of the case

A26-0654 Draft IFP order

Crow Wing County RPM prima facie determination (A26-0652)

A26-0652 IFP motion and affidavit

A26-0652 Scheffler statement of the case

A26-0652 Draft IFP order

Itasca County RPM prima facie determination (A26-0653)

A26-0653 IFP motion and affidavit

A26-0653 Scheffler statement of the case

A26-0653 Draft IFP order

¹ [Maddox v. Department of Human Services, 400 N.W.2d 136, 139 \(Minn. Ct. App. 1987\)](#) (internal brackets and ellipsis omitted).

² Documents filed with, and issued by, the Court of Appeals in these matters are available via [P-MACS](#).

**STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING THE REPUBLICAN PARTY OF MINNESOTA

On March 16, 2026, the Campaign Finance and Public Disclosure Board (the “Board”) received a complaint submitted by Troy Scheffler regarding the Republican Party of Minnesota, Board registration number 20008 (the “Complaint”). The Republican Party of Minnesota is a political party unit. Upon receipt of the Complaint, the Board’s chair ordered that the full board would make the prima facie determination according to Minn. Stat. § 10A.022, subd. 3(c).

Summary of Complaint

The Complaint alleges the Republican Party of Minnesota violated the disclaimer requirement contained in Minn. Stat. § 211B.04 in two ways. First, by sending an “email to supporters” that did not contain a disclaimer substantially in the form provided in Minn. Stat. § 211B.04, subd. 1(b). The email at issue is attached to the Complaint as Exhibit 1. Second, by publishing a website at mngop.com without a disclaimer in the form provided by the statute. The Complaint includes a printout of the website as Exhibit 2. Both Exhibits 1 and 2 are included with the Complaint and may be considered at the Board’s prima facie review. The Complaint alleges, and the Board assumes as true at this stage, that both communications qualify as campaign material subject to the requirements of Minn. Stat. § 211B.04.

Turning to the material itself, the email included as Exhibit 1 has a subject line that reads “The Road to the MNGOP State Convention Has Begun.” The email describes the Republican Party of Minnesota’s upcoming “convention season,” including precinct caucuses, BPOU conventions, and Congressional District conventions. “All of this leads up to the **Republican Party of Minnesota State Convention, which will take place May 29-30 at the Duluth Entertainment Convention Center (DECC) in Duluth.**” (emphasis in original). The email then describes the “[i]mportant work that takes place at BPOU and CD conventions” and urges recipients to engage in the party convention process: “In short, the work conducted at the State Convention plays a critical role in ensuring the Republican Party of Minnesota is positioned to increase participation, expand voter turnout, and elect Republicans up and down the ballot.” The email further explains that “our Party always needs strong candidates willing to step forward and run for office If you are interested—or if someone encourages you to consider it—I hope you will give it thoughtful consideration. Thank you for all you do for your Party and for the future of Minnesota.”

The email is signed by Donna Bergstrom, Deputy Chair, Republican Party of Minnesota. Underneath the signature, as “P.S.,” the email urges supporters to “consider donating to the Party” and it provides a link to an online donation page created by the committee through WinRed. That

donation page contains a disclaimer, which reads “Paid for by the Republican Party of Minnesota. Not authorized by any candidate or candidate’s committee. www.mngop.org” The websites mngop.org redirects to mngop.com. The email also provides other ways to contact the Republican Party of Minnesota. It suggests supporters may mail a check to “Republican Party of Minnesota, 7400 Metro Blvd, Suite 424, Edina, MN 55439-2374.” At the bottom of the email, it indicates “*Republican Party of Minnesota – Website.*” The Complaint indicates that the “website” referenced in the email “contains a hyperlink to the RPM’s website (https:// mngop.com).”

Exhibit 2 is a printout of that website, mngop.com The website contains the following disclaimer language at the bottom of the page:

+1 (651) 222-0022 | info@mngop.com
Paid for by the Republican Party of Minnesota.
7400 Metro Blvd., Suite 424, Edina, Minnesota 55439-2374.
Not coordinated with or approved by any candidate nor is any candidate or their committee responsible for this website or its content.

Comparing the email and website to the disclaimer language provided in Minn. Stat. § 211B.04, subd. 1(b), the Complaint points out that the website omits the word “Prepared” and the email omits the words “Prepared and paid for.” The Complaint acknowledges that Minn. Stat. § 211B.04, subd. 1(a) permits disclaimer language “substantially in the form” as the statutory language, but urges that the word “‘substantially’ contemplates minor variations in phrasing or formatting—not the wholesale deletion of an operative element of the prescribed form.” *Id.* The Complainant contends that campaign material cannot substantially comply if there is a “complete omission” of the words “prepared” or “paid for” (or both) because the terms provide “legally significant content” allowing the public to investigate vendors or other individuals working on campaign material.

Prima Facie Determination

In deciding whether a complaint alleges a prima facie violation of Chapter 211B, courts have considered whether the complaint “includes evidence or alleges facts that, if accepted as true, would be sufficient to prove a violation. . . .” *Barry v. St. Anthony-New Brighton Indep. Sch. Dist.* 282, 781 N.W.2d 898, 902 (Minn. Ct. App. 2010). At the prima-facie stage, the Board considers only the allegations and evidence provided with the complaint and arguments of the respondent, if any. See Minn. Rule 4525.0210, Subp. 1.

The question here is whether the factual allegations in the Complaint, accepted as true, establish that the Republican Party of Minnesota failed to include a disclaimer that is substantially in the form required by Minn. Stat. § 211B.04.

Disclaimer requirements like those in Minn. Stat. § 211B.04 have long been justified by the government’s interest in informing the electorate about “the sources of election-related spending,” *Citizens United v. Fed. Election Comm’n*, 558 U.S. 310, 366 (2010); *Buckley v. Valeo*, 424 U.S. 1, 66-68 (1976). The Minnesota Court of Appeals has affirmed the constitutionality of section 211B.04 in its current form, in part because the statute “imposes only the type of limited disclaimer

requirement long permitted as a means of informing the electorate about the election-related spending of certain political actors.” *Lewison v. Hutchinson*, 929 N.W.2d 444, 448-44 (Minn. Ct. App. 2019) (upholding statute and distinguishing earlier decisions invalidating prior versions).

Section 211B.04 provides specific disclaimer language, but it does not require that campaign material use that language word-for-word. The “person or committee causing the material to be prepared or disseminated” need only include “a disclaimer substantially in the form provided” by the statute. Minn. Stat. § 211B.04, subd. 1(a). Accordingly, this Board has dismissed complaints where the material at issue included a “majority” of the language required by section 211B.04 or where the information appeared on different parts of the communication rather than one “prepared and paid for by the . . . committee . . . (address)” line. *See In Matter of the Complaint of Amber Buysman regarding the Voegeli (Dwayne) 4 House committee*, Prima Facie Order, (Mar. 14, 2024) (dismissing complaint where campaign mailer included information required for a disclaimer in different sections of the mailer); *In the Matter of the Complaint of Sharon Mueller regarding the Matt Entenza for Auditor Committee*, Probable Cause Order, (Oct. 7, 2014) (dismissing complaint that did not “technically” comply where the text “Paid for by Matt Entenza for Auditor” appeared on one side of a mailer, the mailer did not include the “prepared for” language at all, and the material provided the committee’s mailing address as a return address on the opposite side of the mailer); *In the Matter of the Complaint of Parisa Rouzegar Regarding the Angeline (Anderson) for Minnesota Committee*, Probable Cause Order, (Sept. 4, 2024) (dismissing complaint where disclaimer appeared after clicking a banner ad on a website); *cf. In Probable Cause Determination in the Matter of the Complaint of Luke Mielke Regarding Minneapolis Forward*, Probable Cause Order, (June 5, 2024) (concluding that a website substantially complied with the disclaimer requirement where “[t]he disclaimer on the website contains a majority of the independent expenditure disclaimer text and substantially complies with the requirements of Minnesota Statutes section 211B.04”).

Interpreting the same statute, the Office of Administrative Hearings (“OAH”) has been more specific, finding that material substantially complies with the disclaimer requirement as long as the material contains “contact information” and it is clear who is responsible for the material.¹ For example, in *In the Matter of the Campaign Complaint of Mastrud v. Ellison*, OAH 12-0320-16153-CV, Finding of No Probable Cause, Order of Dismissal (Sep. 21, 2004) (hereafter “*Ellison*”) OAH considered the website for then-Rep. Keith Ellison, which did not contain any disclaimer. The OAH observed the website contained the substance required by the statute—it identified the name of the committee and its contact information in a section of the website asking for contributions. For the OAH, this was enough: “The statute itself only requires substantial compliance. Anyone looking at the site can see that the committee is the organization asking for money and volunteers to support Respondent and is the organization that, along with Respondent himself, prepared the content of the site. And the site lists all the regular and email addresses and phone numbers necessary for anyone who might have questions about the site. The site complies

¹ Before 2013, the Board did not have jurisdiction over Minn. Stat. § 211B.04. Alleged violations of the disclaimer mandate in Minn. Stat. § 211B.04 were handled by either the OAH or county attorneys. Although the Board is not required to follow the OAH’s decisions, the Board will consider how other state agencies have considered and applied the same statutory requirements.

with the requirements of Minn. Stat. § 211B.04.” *Id*; see also *Wagner v. Heidgerken*, OAH 15-0320-16176, Finding of No Probable Cause, (Oct. 5, 2004) (dismissing complaint where material did not include disclaimer but “prominently features the Respondent's name and address”); *Behrens v. Rossbach*, OAH 12-6361-17183, Order Finding No Prima Facie Violation, (March 24, 2006) (dismissing complaint where material had no disclaimer language but still identified who “prepared, disseminated, and paid for the campaign material”); *Gadsden v. Kiffmeyer*, OAH 3-0320-21609-CV, Order, (Nov. 1, 2010)(concluding that material substantially complied with disclaimer requirement even though material did not include a disclaimer, but clearly identified the candidate and included a reference to a website containing complete disclaimer information).

As this history demonstrates, material has been found to substantially comply with the disclaimer requirement in Minn. Stat. § 211B.04 if it contains substantive information mandated by the statute—essentially the name of the committee responsible for the material and its address (either the mailing address or a the address for a website containing the mailing address). Minn. Stat. § 211B.04, subd. 1(b).

The email to Republican Party supporters attached as Exhibit 1 to the Complaint contains a disclaimer substantially in the form provided by Minn. Stat. § 211B.04, subd. 1(b). The email provides the substantive information required by the statute—it provides the committee’s name and mailing address: Republican Party of Minnesota, 7400 Metro Blvd, Suite 424, Edina, MN 55439-2374. It includes a link to the Republican Party of Minnesota’s WinRed website, which also includes the committee’s mailing address. Further down, at the bottom of the email, it again identifies the name of the committee—“Republican Party of Minnesota”—and provides a link to the committee’s website at mngop.com. The committee’s website again provides a disclaimer with the committee’s mailing address, phone number, and other contact information. The email thus provides the committee’s name and address multiple times in different ways, and is substantially in the form required by the statute.

The Board reaches the same conclusion with respect to the Republican Party of Minnesota’s website, included as Exhibit 2 to the Complaint. The website’s disclaimer includes the name of the committee, the committee’s mailing address, and identification as to who is responsible for the site’s content. The website’s disclaimer also includes the phone number, website address, and additional substantive information that the committee’s communications were not authorized by any candidate. The website therefore is “substantially in the form provided in” Minn. Stat. § 211B.04, subdivision 1, paragraph (b) even though it omits the word “prepared.”

The complainant argues that section 211B.04 requires campaign material to always include the specific words “prepared and paid for.” The Board has never adopted this position, and the OAH has expressly rejected it in multiple cases. The Board declines to adopt complainant’s position because the statute permits disclaimer language “substantially in the form” of the provided language disclosing who is seeking to influence elections. The Board concludes that a disclaimer on campaign material may be “substantially in the form provided” by 211B.04, subd. 1(b) if the disclaimer prominently discloses substantive information as to who “prepared or disseminated the

material,” including at least the person or committee’s name and address, even if it does not use the exact words “prepared and paid for.”

The complainant argues that the term “prepared” creates additional substantive requirements for disclosure because “[i]f someone other than the RPM prepared the website’s content—the design, the copywriting, the web development, the press releases, the solicitation language—and the RPM did not pay fair market value for those services, an in-kind contribution may exist that should appear on the RPM’s financial reports.” But this assumes that the disclaimer requirement essentially acts as a broader reporting requirement, mandating a list of all vendors and employees who contributed to the material’s production so the public can cross check the disclaimer against reports filed under Chapter 10A. That is not what the statute requires. Rather, the statutory requirement applies to “the person or committee causing the material to be prepared or disseminated,” Minn. Stat. § 211B.04, subd. 1(a), and is intended to “inform the electorate ‘about the sources of election-related spending.’” *Lewinson*, 929 N.W.2d at 449. An individual or committee may provide enough necessary information to inform the electorate about who is responsible for the preparation of campaign material without using the specific word “prepared,” but even if the word “prepared” were required, it would not lead to the disclosure of every person literally involved in creation of the material as complainant suggests.

Based on the foregoing analysis, the complaint does not state a prima facie violation of Minnesota Statutes section 211B.04. The complaint is dismissed without prejudice.



David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: April 1, 2026

CONFIDENTIAL

STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

In the Matter of the Complaint of
Troy Scheffler Regarding the
Republican Party of Minnesota
(Registration No. 20008)

**Motion and Affidavit for
Proceeding In Forma Pauperis in the
Court of Appeals**

APPELLATE CASE #:
CFB CASE FILED: 03/17/2026
DATE OF DECISION: **04/01/2026**

State of Minnesota)
) SS
County of Crow Wing)

1. I believe that I have valid reasons for pursuing this Court of Appeals action and I move for an order granting me the following relief: Waiving appellate court filing fees and cost bond.

2. I am a party in this action and in good faith I request an Order to proceed In Forma Pauperis. I have attached a copy of my statement of the case or petition being filed in the appellate court, showing the proposed issues on appeal.

3. I am receiving public assistance under one or more of the following programs: Medicare Part B reimbursement, see MN Stat. 256B .057 subd.4. (Attached)

By signing this Affidavit, I am certifying that these statements are true under penalty of perjury. I understand that if I provide false information on the form it may lead to criminal charges. I understand that if I provide information or requested records may result in denial of my motion to proceed In Forma Pauperis. I am authorizing that the facts contained in this Affidavit may be verified by any means required.

/s/ **Troy Scheffler**
Troy Scheffler
26359 Shandy Trl.
Merrifield, MN 56465
763-225-7702
troyscheffler@gmail.com

04/13/2026

INVOICE DATE	INVOICE NUMBER	DESCRIPTION	INVOICE AMOUNT
04/01/2026	10-Apr	MED PART B HS Service Date: HS Desc:	\$202.90

[REDACTED]				
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Vendor No.	Vendor Name	EFT No.	EFT Date	EFT Amount
[REDACTED]	TROY K SCHEFFLER	[REDACTED]	04/10/2026	\$202.90



Crow Wing County Community Services
 PO Box 686
 Brainerd, MN 56401
 PH. (218) 824-1047

Vendor Number	EFT Date	EFT Number
[REDACTED]	04/10/2026	[REDACTED]

\$202.90

Pay Two Hundred Two Dollars and 90 Cents

To the Order Of TROY K SCHEFFLER
 26359 SHANDY TRAIL
 MERRIFIELD, MN 56465

**EFT FILE COPY
 NON-NEGOTIABLE**

FILED

April 14, 2026

STATE OF MINNESOTA
IN COURT OF APPEALS

In the Matter of the Complaint of
Troy Scheffler Regarding the
Republican Party of Minnesota
(Registration No. 20008)

**STATEMENT OF THE CASE OF
RELATOR**

APPELLATE CASE #:
CFB CASE FILED: 03/16/2026
DATE OF DECISION: **04/01/2026**

1. **Agency where case originated:** Minnesota Campaign Finance and Public Disclosure Board.

Name of presiding judge or hearing officer: Chair, David Asp

2. **Jurisdictional statement for a certiorari appeal:** MN Stat: 14.63, 14.64

Authority fixing time limit and date of event triggering appeal time; mailing notice of final order 04/02/2026: MN Stat. 14.63, 14.64

3. **Type of litigation and any statutes at issue:**

Respondent violated Minn. Stat. § 211B.04 by disseminating campaign material without disclaimers in the form required by statute.

4. **Brief description of issues that were raised before the administrative or agency decision maker, and how the administrative or agency decision maker decided those issues:**

ISSUES RAISED:

§211B.04 - RPM website at mngop.com contains disclaimer reading “Paid for by the Republican Party of Minnesota” omitting the statutory element “prepared and.” Mass email sent March 11, 2026 via Viking Stack platform contained no disclaimer of any kind. Third-party vendor (Tovsen Development) involved in email dissemination does not appear in RPM’s campaign finance reports.

HOW DECIDED:

Dismissed without prejudice. Board ruled:

Website disclaimer “substantially complies” despite omitting “prepared and”

Email “substantially complies” because committee name and address appear in donation solicitation sections. Viking Stack/Tovsen allegations entirely ignored.

5. Short description of issues you are raising in this appeal:

The Board erred by finding “substantial compliance” where the website disclaimer omits “prepared and” and the email contains no disclaimer language of any kind, rendering the word “prepared” surplusage in violation of Minn. Stat. § 645.16.

The Board conflated “substantially in the form” with “substantial compliance,” ignored the complaint’s allegations regarding third-party vendor involvement, and attempted to bootstrap the email’s compliance through the website’s own deficient disclaimer.

The Board applied the wrong standard at the prima facie stage, conducted a merits analysis rather than accepting allegations as true, and Chair Asp should have recused himself given his role as defense counsel in the foundational and abjectly erroneous *Gadsden v. Kiffmeyer* precedent.

Relator seeks review of the entire Prima Facie Determination.

6. Related appeals:

a. List any prior or pending appeals arising from the same agency case as this appeal: None.

b. List any pending appeals arising from different agency cases that raise similar issues to this appeal: None known.

7. Contents of record:

a. Is a transcript necessary to review the issues on appeal? No.

b. If yes, is it a full transcript of the hearing(s) before the administrative decision-maker, or a partial transcript? N/A

c. Has the transcript been ordered from the court reporter? N/A.

d. If a transcript is unavailable, is a statement of the proceedings under Minnesota Rules of Civil Appellate Procedure 110.03 necessary? N/A.

e. In lieu of the record as defined in Minnesota Rules of Civil Appellate Procedure 110.01, have the parties agreed to prepare a statement of the record pursuant to Minnesota Rules of Civil Appellate Procedure 110.04? No.

8. **Oral argument:**

a. If you have an attorney, is oral argument requested? No.

b. N/A

9. **Type of Brief to be filed:**

Informal Brief under Rule 128.01, subd. 1.

10. **Names, addresses, and telephone numbers of relator and respondents:**

Relator:

/s/ **Troy Scheffler**
Troy Kenneth Scheffler
26359 Shandy Trl, Merrifield, MN 56465
troyscheffler@gmail.com
763-225-7702

04/13/2026

Respondent Republican Party of Minnesota (Registration No. 20008)
7400 Metro Blvd., Suite 424
Edina, MN 55439-2374
info@mngop.com

Respondent Campaign Finance and Public Disclosure Board:
Nathan J. Hartshorn, Assistant Attorney General (MN#0320602)
445 Minnesota Street, Suite 600
St. Paul, Minnesota 55101-2134
(651) 757-1252

**STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**ORDER ON MOTION TO
PROCEED IN FORMA PAUPERIS**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING THE REPUBLICAN PARTY OF MINNESOTA

On March 16, 2026, the Campaign Finance and Public Disclosure Board received a complaint submitted by Troy Scheffler regarding the Republican Party of Minnesota, which is a political party unit.¹ The complaint alleged violations of the disclaimer requirement for campaign material. The full Board made a prima facie determination dismissing the complaint on April 1, 2026.

Mr. Scheffler filed a petition for a writ of certiorari with the Court of Appeals on April 14, 2026, seeking judicial review under Minnesota Statutes section 14.63. On April 13, 2026, Mr. Scheffler mailed his Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals to the Board by certified mail, along with his Statement of the Case.

The affidavit states that Mr. Scheffler is receiving public assistance, consisting of “Medicare Part B reimbursement”. The affidavit includes a document indicating that Mr. Scheffler received a \$202.90 reimbursement on April 10, 2026, from Crow Wing County Community Services, related to Medicare Part B. In 2026 the standard monthly premium for Medicare Part B insurance is \$202.90.² Minnesota Statutes section 563.01, subdivision 3, paragraph (b), provides that if an “appeal is not of a frivolous nature,” an individual seeking to proceed *in forma pauperis* is generally presumed to qualify if they receive “public assistance described in section 550.37, subdivision 14. . . .” Minnesota Statutes section 550.37, subdivision 14, provides that “government assistance based on need includes but is not limited to . . . payment of Medicare part B premiums. . . .”

The Statement of the Case asserts:

The Board erred by finding “substantial compliance” where the website disclaimer omits “prepared and” and the email contains no disclaimer language of any kind, rendering the word “prepared” surplusage in violation of Minn. Stat. § 645.16.

The Board conflated “substantially in the form” with “substantial compliance,” ignored the complaint’s allegations regarding third-party vendor involvement, and

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/party-unit/20008/

² cms.gov/newsroom/fact-sheets/2026-medicare-parts-b-premiums-deductibles

attempted to bootstrap the email's compliance through the website's own deficient disclaimer.

The Board applied the wrong standard at the prima facie stage, conducted a merits analysis rather than accepting allegations as true, and Chair Asp should have recused himself given his role as defense counsel in the foundational and abjectly erroneous *Gadsden v. Kiffmeyer* precedent.

Based on the above background and the record in this matter, the Board makes the following:

Findings of Fact

1. On March 16, 2026, the Campaign Finance and Public Disclosure Board received a complaint filed by Troy Scheffler regarding the Republican Party of Minnesota. The complaint alleged violations of the disclaimer requirement under Minnesota Statutes section 211B.04, regarding a website and an email.
2. The Board's chair ordered that the prima facie determination be made by the full Board under Minnesota Statutes section 10A.022, subdivision 3, paragraph (c). On April 1, 2026, the Board determined that the complaint did not state a prima facie violation of Minnesota Statutes section 211B.04 and dismissed the complaint.
3. On April 13, 2026, Mr. Scheffler filed his Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals by mailing it, with his Statement of the Case, to the Board. The affidavit indicates that Mr. Scheffler receives public assistance in the form of payment of Medicare Part B premiums. The Statement of the Case describes the appeal as being based, in part, on the assertion that the Board erred in determining that the alleged campaign material referenced in the complaint included a disclaimer substantially in the form required by Minnesota Statutes section 211B.04.

Based on the above findings of fact, the Board makes the following:

Conclusions of Law

1. Based on the Statement of the Case, at least some of the issues raised in this appeal are not frivolous.
2. Mr. Scheffler meets the criteria for proceeding *in forma pauperis*.

Based on the above findings of fact and conclusions of law, the Board issues the following:

Order

1. The Motion to Proceed In Forma Pauperis is granted.

David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: _____

DRAFT

**STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING THE CROW WING COUNTY
RPM

On March 17, 2026, the Campaign Finance and Public Disclosure Board received a complaint submitted by Troy Scheffler regarding the Crow Wing County RPM, Board registration number 20131(the Complaint). The Crow Wing County RPM is a political party unit.¹ Upon receipt of the Complaint, the Board’s chair ordered that the full board would make the prima facie determination according to Minn. Stat. § 10A.022, subd. 3(c).

Summary of Complaint

The Complaint alleges that the Crow Wing County RPM violated the disclaimer requirement for campaign material contained in Minn. Stat. §211B.04. The complaint includes a copy of an email sent on March 14, 2026, with the subject line “Crow Wing Cty Convention Info, Call, Documents”. The Complaint also provides a copy of a document identified as “Convention Volunteers Needed” which is linked in the email. The email at issue is attached to the Complaint as Exhibit 1, the document “Convention Volunteers Needed” is attached to the Complaint as Exhibit 2. Both exhibits may be considered at the Board’s prima facie review. The email is directed to delegates and alternates to the Crow Wing County RPM’s convention on March 28, 2026. The email seeks volunteers to help with the convention. The email notes that at the Crow Wing County convention, delegates will be elected to other conventions, including those of the 8th Congressional District RPM and the Republican Party of Minnesota. The email notes that fees are paid by delegates to attend the conventions of the 8th Congressional District RPM and the Republican Party of Minnesota. The Complaint alleges, and the Board assumes as true at this stage, that the email qualifies as campaign material subject to the requirements of Minn. Stat. § 211B.04.

The email is drafted as a message from the party unit’s deputy chair and includes text near the bottom stating “See you at Convention! Donna Winge, Deputy Chair Crow Wing County Republicans. The bottom of the email includes the text “Crow Wing County RPM GOP-20131 | PO Box 926 | Brainerd, MN 56401 US”. The email says that questions may be directed to an email address, which the complaint states is the personal email address of Ms. Winge. The email includes links to a convention call,² a convention agenda,³ proposed rules for the

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/party-unit/20131/

² files.constantcontact.com/5c6f88c7901/fc6d39cc-6451-40e4-9c5e-41d1d7b4373a.pdf

³ files.constantcontact.com/5c6f88c7901/a5209f93-52cd-4fba-89ac-8f86fb5d6dbe.pdf

convention,⁴ and a document seeking convention volunteers⁵. Except for the document seeking volunteers, each of those documents include a disclaimer stating:

Prepared and paid for by Crow Wing County RPM
www.cwgop.com⁶

The Complaint alleges that the email violates the disclaimer requirement because the email did not include text stating who “prepared and paid for” the email.

The Complaint notes that the Crow Wing County RPM entered into a conciliation agreement with the Board addressing violations of the disclaimer requirement that occurred in 2024.⁷ The complaint asks the Board to “consider whether Respondent’s continued disclaimer violations constitute noncompliance with the Conciliation Agreement. However, the only requirement imposed on the Crow Wing County RPM by that agreement was payment of a \$100 civil penalty, which was timely paid in 2025. On March 24, 2026, the complainant emailed the Board a copy of an email sent by the Crow Wing County RPM on the same day, which includes a disclaimer stating “Prepared & paid for by Crow Wing County RPM cwgop.com”. The March 24 email discusses the party unit’s upcoming convention and the complainant alleges that “This confirms that Respondent is aware of the disclaimer requirement and that its omission on March 14 was not the result of a good-faith belief that convention materials are exempt.”

Prima Facie Determination

In deciding whether a complaint alleges a prima facie violation of Chapter 211B, courts have considered whether the complaint “includes evidence or alleges facts that, if accepted as true, would be sufficient to prove a violation. . . .” *Barry v. St. Anthony-New Brighton Indep. Sch. Dist.* 282, 781 N.W.2d 898, 902 (Minn. Ct. App. 2010). At the prima-facie stage, the Board considers only the allegations and evidence provided with the complaint and arguments of the respondent, if any. See Minn. Rule 4525.0210, Subp. 1.

The question here is whether the factual allegations in the Complaint, accepted as true, establish that the Crow Wing County RPM failed to include a disclaimer that is substantially in the form required by Minn. Stat. § 211B.04.

Disclaimer requirements like those in Minn. Stat. § 211B.04 have long been justified by the government’s interest in informing the electorate about “the sources of election-related spending,” *Citizens United v. Fed. Election Comm’n*, 558 U.S. 310, 366 (2010); *Buckley v. Valeo*, 424 U.S. 1, 66-68 (1976). The Minnesota Court of Appeals has affirmed the constitutionality of section 211B.04 in its current form, in part because the statute “imposes only the type of limited disclaimer

⁴ files.constantcontact.com/5c6f88c7901/6baee758-3ac6-4251-90aa-cd49ac92eaea.pdf

⁵ files.constantcontact.com/5c6f88c7901/463698b2-f25c-4fc8-a6c7-c8914352589c.pdf

⁶ In one instance, the word “and” is replaced by the symbol “&”.

⁷ cfb.mn.gov/pdf/bdactions/1743_Conciliation_Agreement.pdf

requirement long permitted as a means of informing the electorate about the election-related spending of certain political actors.” *Lewis v. Hutchinson*, 929 N.W.2d 444, 448-44 (Minn. Ct. App. 2019) (upholding statute and distinguishing earlier decisions invalidating prior versions).

Section 211B.04 provides specific disclaimer language, but it does not require that campaign material use that language word-for-word. The “person or committee causing the material to be prepared or disseminated” need only include “a disclaimer substantially in the form provided” by the statute. Minn. Stat. § 211B.04, subd. 1(a). Accordingly, this Board has dismissed complaints where the material at issue included a “majority” of the language required by section 211B.04 or where the information appeared on different parts of the communication rather than one “prepared and paid for by the . . . committee . . . (address)” line. *See In Matter of the Complaint of Amber Buysman regarding the Voegeli (Dwayne) 4 House committee*, Prima Facie Order, (Mar. 14, 2024) (dismissing complaint where campaign mailer included information required for a disclaimer in different sections of the mailer); *In the Matter of the Complaint of Sharon Mueller regarding the Matt Entenza for Auditor Committee*, Probable Cause Order, (Oct. 7, 2014) (dismissing complaint that did not “technically” comply where the text “Paid for by Matt Entenza for Auditor” appeared on one side of a mailer, the mailer did not include the “prepared for” language at all, and the material provided the committee’s mailing address as a return address on the opposite side of the mailer); *In the Matter of the Complaint of Parisa Rouzegar Regarding the Angeline (Anderson) for Minnesota Committee*, Probable Cause Order, (Sept. 4, 2024) (dismissing complaint where disclaimer appeared after clicking a banner ad on a website); *cf. In Probable Cause Determination in the Matter of the Complaint of Luke Mielke Regarding Minneapolis Forward*, Probable Cause Order, (June 5, 2024) (concluding that a website substantially complied with the disclaimer requirement where “[t]he disclaimer on the website contains a majority of the independent expenditure disclaimer text and substantially complies with the requirements of Minnesota Statutes section 211B.04”).

Interpreting the same statute, the Office of Administrative Hearings (“OAH”) has been more specific, finding that material substantially complies with the disclaimer requirement as long as the material contains “contact information” and it is clear who is responsible for the material.⁸ For example, in *In the Matter of the Campaign Complaint of Mastrud v. Ellison*, OAH 12-0320-16153-CV, Finding of No Probable Cause, Order of Dismissal (Sep. 21, 2004) (hereafter “*Ellison*”) OAH considered the website for then-Rep. Keith Ellison, which did not contain any disclaimer. The OAH observed the website contained the substance required by the statute—it identified the name of the committee and its contact information in a section of the website asking for contributions. For the OAH, this was enough: “The statute itself only requires substantial compliance. Anyone looking at the site can see that the committee is the organization asking for money and volunteers to support Respondent and is the organization that, along with Respondent himself, prepared the content of the site. And the site lists all the regular and email addresses and phone numbers necessary for anyone who might have questions about the site. The site complies

⁸ Before 2013, the Board did not have jurisdiction over Minn. Stat. § 211B.04. Alleged violations of the disclaimer mandate in Minn. Stat. § 211B.04 were handled by either the OAH or county attorneys. Although the Board is not required to follow the OAH’s decisions, the Board will consider how other state agencies have considered and applied the same statutory requirements.

with the requirements of Minn. Stat. § 211B.04.” *Id*; see also *Wagner v. Heidgerken*, OAH 15-0320-16176, Finding of No Probable Cause, (Oct. 5, 2004) (dismissing complaint where material did not include disclaimer but “prominently features the Respondent's name and address”); *Behrens v. Rossbach*, OAH 12-6361-17183, Order Finding No Prima Facie Violation, (March 24, 2006) (dismissing complaint where material had no disclaimer language but still identified who “prepared, disseminated, and paid for the campaign material”); *Gadsden v. Kiffmeyer*, OAH 3-0320-21609-CV, Order, (Nov. 1, 2010)(concluding that material substantially complied with disclaimer requirement even though material did not include a disclaimer, but clearly identified the candidate and included a reference to a website containing complete disclaimer information).

As this history demonstrates, material has been found to substantially comply with the disclaimer requirement in Minn. Stat. § 211B.04 if it contains substantive information mandated by the statute—essentially the name of the committee responsible for the material and its address (either the mailing address or an address for a website containing the mailing address). Minn. Stat. § 211B.04, subd. 1(b).

The email to delegates and alternates to the Crow Wing County RPM’s convention, attached as Exhibit 1 to the Complaint, contains a disclaimer substantially in the form provided by Minn. Stat. § 211B.04, subd. 1(b). The email provides the substantive information required by the statute—it provides the committee’s name, registration number, and mailing address: Crow Wing County RPM GOP-20131, PO Box 926 Brainerd, MN 56401. It includes an email for the Deputy Chair of the Crow Wing County Republicans. Additionally, the email contains links to two documents that contain a campaign disclaimer in the form “Prepared and paid for by the Crow Wing County RPM www.cwgom.com”. The committee’s website again provides a disclaimer with the committee’s mailing address, phone number, and other contact information. The email thus provides the committee’s name and address multiple times in different ways, and is substantially in the form required by the statute.

The complainant argues that section 211B.04 requires campaign material to always include the specific words “prepared and paid for.” The Board has never adopted this position, and the OAH has expressly rejected it in multiple cases. The Board declines to adopt complainant’s position because the statute permits disclaimer language “substantially in the form” of the provided language disclosing who is seeking to influence elections. The Board concludes that a disclaimer on campaign material may be “substantially in the form provided” by 211B.04, subd. 1(b) if the disclaimer prominently discloses substantive information as to who “prepared or disseminated the material,” including at least the person or committee’s name and address, even if it does not use the exact words “prepared and paid for.”

The Complaint asserts that the document seeking volunteers (Exhibit 2), linked to within the email, was separately required to include a disclaimer. The complaint does not include evidence that the version of the document that lacked a disclaimer was disseminated by any means other than the email depicted in the complaint. The complaint includes evidence that another version of that document that was published on the Crow Wing County RPM’s website includes a disclaimer. There is no reason to believe that anyone viewed the version without a

disclaimer without first viewing the email depicted in the complaint. The email includes a disclaimer substantially in the form required by statute. Therefore, the specific version of the document seeking volunteers linked to within that email was not required to include a separate disclaimer.

Based on the foregoing analysis, the complaint does not state a prima facie violation of Minnesota Statutes section 211B.04. The complaint is dismissed without prejudice.



David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: April 1, 2026

CONFIDENTIAL

STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

In the Matter of the Complaint of
Troy Scheffler Regarding the
Crow Wing County RPM
(Registration No. 20131)

**Motion and Affidavit for
Proceeding In Forma Pauperis in the
Court of Appeals**

APPELLATE CASE #:
CFB CASE FILED: 03/17/2026
DATE OF DECISION: **04/01/2026**

State of Minnesota)
) SS
County of Crow Wing)

1. I believe that I have valid reasons for pursuing this Court of Appeals action and I move for an order granting me the following relief: Waiving appellate court filing fees and cost bond.
2. I am a party in this action and in good faith I request an Order to proceed In Forma Pauperis. I have attached a copy of my statement of the case or petition being filed in the appellate court, showing the proposed issues on appeal.
3. I am receiving public assistance under one or more of the following programs: Medicare Part B reimbursement, see MN Stat. 256B .057 subd.4. (Attached)

By signing this Affidavit, I am certifying that these statements are true under penalty of perjury. I understand that if I provide false information on the form it may lead to criminal charges. I understand that if I provide information or requested records may result in denial of my motion to proceed In Forma Pauperis. I am authorizing that the facts contained in this Affidavit may be verified by any means required.

/s/ Troy Scheffler
Troy Scheffler
26359 Shandy Trl.
Merrifield, MN 56465
763-225-7702
troyscheffler@gmail.com

04/13/2026



INVOICE DATE	INVOICE NUMBER	DESCRIPTION	INVOICE AMOUNT
04/01/2026	10-Apr	MED PART B HS Service Date: HS Desc:	\$202.90



Vendor No.	Vendor Name	EFT No.	EFT Date	EFT Amount
[REDACTED]	TROY K SCHEFFLER	[REDACTED]	04/10/2026	\$202.90



Crow Wing County Community Services
 PO Box 686
 Brainerd, MN 56401
 PH. (218) 824-1047

Vendor Number	EFT Date	EFT Number
[REDACTED]	04/10/2026	[REDACTED]

\$202.90

Pay Two Hundred Two Dollars and 90 Cents

To the Order Of TROY K SCHEFFLER
 26359 SHANDY TRAIL
 MERRIFIELD, MN 56465

**EFT FILE COPY
 NON-NEGOTIABLE**

FILED

April 14, 2026

STATE OF MINNESOTA
IN COURT OF APPEALS

In the Matter of the Complaint of
Troy Scheffler Regarding the
Crow Wing County RPM
(Registration No. 20131)

**STATEMENT OF THE CASE OF
RELATOR**

APPELLATE CASE #:
CFB CASE FILED: 03/17/2026
DATE OF DECISION: **04/01/2026**

1. **Agency where case originated:** Minnesota Campaign Finance and Public Disclosure Board.

Name of presiding judge or hearing officer: Chair, David Asp

2. **Jurisdictional statement for a certiorari appeal:** MN Stat: 14.63, 14.64

Authority fixing time limit and date of event triggering appeal time; mailing notice of final order 04/02/2026: MN Stat. 14.63, 14.64

3. **Type of litigation and any statutes at issue:**

Respondent violated Minn. Stat. § 211B.04 by disseminating campaign material without disclaimers in the form required by statute.

4. **Brief description of issues that were raised before the administrative or agency decision maker, and how the administrative or agency decision maker decided those issues:**

ISSUES RAISED:

§211B.04 - Mass email sent via Constant Contact on March 14, 2026 lacked any disclaimer. A linked volunteer flyer hosted on a third-party server also lacked a disclaimer, while the same flyer on CWGOP's own website included one.

HOW DECIDED:

All dismissed without prejudice. Board ruled:

Allegations "previously addressed" in prior determinations (Feb, April, July

RPM payment allegation was "speculation unsupported by evidence"

5. **Short description of issues you are raising in this appeal:**

The Board erred by treating a third-party CAN-SPAM footer as a campaign disclaimer when the words "prepared and paid for by" do not appear anywhere on the material.

The Board conflated "substantially in the form" with "substantial compliance," two distinct legal concepts.

The Board applied the wrong standard at the prima facie stage and Chair Asp should have recused himself.

Relator seeks review of the entire Prima Facie Determination.

6. **Related appeals:**

a. List any prior or pending appeals arising from the same agency case as this appeal: None.

b. List any pending appeals arising from different agency cases that raise similar issues to this appeal: None known.

7. **Contents of record:**

a. Is a transcript necessary to review the issues on appeal? No.

b. If yes, is it a full transcript of the hearing(s) before the administrative decision-maker, or a partial transcript? N/A

c. Has the transcript been ordered from the court reporter? N/A.

d. If a transcript is unavailable, is a statement of the proceedings under Minnesota Rules of Civil Appellate Procedure 110.03 necessary? N/A.

e. In lieu of the record as defined in Minnesota Rules of Civil Appellate Procedure 110.01, have the parties agreed to prepare a statement of the record pursuant to Minnesota Rules of Civil Appellate Procedure 110.04? No.

8. **Oral argument:**

a. If you have an attorney, is oral argument requested? No.

b. N/A

9. **Type of Brief to be filed:**

Informal Brief under Rule 128.01, subd. 1.

10. **Names, addresses, and telephone numbers of relator and respondents:**

Relator:

/s/ **Troy Scheffler**

04/13/2026

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troyscheffler@gmail.com
763-225-7702

Respondent Crow Wing County RPM (Registration No. 20131)
PO Box 926
Brainerd, MN 56401
info@cwgop.com

Respondent Campaign Finance and Public Disclosure Board:
Nathan J. Hartshorn, Assistant Attorney General (MN#0320602)
445 Minnesota Street, Suite 600
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(651) 757-1252

**STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**ORDER ON MOTION TO
PROCEED IN FORMA PAUPERIS**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING THE CROW WING COUNTY
RPM

On March 17, 2026, the Campaign Finance and Public Disclosure Board received a complaint submitted by Troy Scheffler regarding the Crow Wing County RPM, which is a political party unit.¹ The complaint alleged violations of the disclaimer requirement for campaign material. The full Board made a prima facie determination dismissing the complaint on April 1, 2026.

Mr. Scheffler filed a petition for a writ of certiorari with the Court of Appeals on April 14, 2026, seeking judicial review under Minnesota Statutes section 14.63. On April 13, 2026, Mr. Scheffler mailed his Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals to the Board by certified mail, along with his Statement of the Case.

The affidavit states that Mr. Scheffler is receiving public assistance, consisting of “Medicare Part B reimbursement”. The affidavit includes a document indicating that Mr. Scheffler received a \$202.90 reimbursement on April 10, 2026, from Crow Wing County Community Services, related to Medicare Part B. In 2026 the standard monthly premium for Medicare Part B insurance is \$202.90.² Minnesota Statutes section 563.01, subdivision 3, paragraph (b), provides that if an “appeal is not of a frivolous nature,” an individual seeking to proceed *in forma pauperis* is generally presumed to qualify if they receive “public assistance described in section 550.37, subdivision 14. . . .” Minnesota Statutes section 550.37, subdivision 14, provides that “government assistance based on need includes but is not limited to . . . payment of Medicare part B premiums. . . .”

The Statement of the Case asserts:

The Board erred by treating a third-party CAN-SPAM footer as a campaign disclaimer when the words "prepared and paid for by" do not appear anywhere on the material.

The Board conflated "substantially in the form" with "substantial compliance," two distinct legal concepts.

The Board applied the wrong standard at the prima facie stage and Chair Asp should have recused himself.

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/party-unit/20131/

² cms.gov/newsroom/fact-sheets/2026-medicare-parts-b-premiums-deductibles

Based on the above background and the record in this matter, the Board makes the following:

Findings of Fact

1. On March 17, 2026, the Campaign Finance and Public Disclosure Board received a complaint filed by Troy Scheffler regarding the Crow Wing County RPM. The complaint alleged violations of the disclaimer requirement under Minnesota Statutes section 211B.04, regarding an email and documents hyperlinked within the email.
2. The Board's chair ordered that the prima facie determination be made by the full Board under Minnesota Statutes section 10A.022, subdivision 3, paragraph (c). On April 1, 2026, the Board determined that the complaint did not state a prima facie violation of Minnesota Statutes section 211B.04 and dismissed the complaint.
3. On April 13, 2026, Mr. Scheffler filed his Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals by mailing it, with his Statement of the Case, to the Board. The affidavit indicates that Mr. Scheffler receives public assistance in the form of payment of Medicare Part B premiums. The Statement of the Case describes the appeal as being based, in part, on the assertion that the Board erred in determining that the alleged campaign material referenced in the complaint included a disclaimer substantially in the form required by Minnesota Statutes section 211B.04.

Based on the above findings of fact, the Board makes the following:

Conclusions of Law

1. Based on the Statement of the Case, at least some of the issues raised in this appeal are not frivolous.
2. Mr. Scheffler meets the criteria for proceeding *in forma pauperis*.

Based on the above findings of fact and conclusions of law, the Board issues the following:

Order

1. The Motion to Proceed In Forma Pauperis is granted.

David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: _____

DRAFT

**STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**PRIMA FACIE
DETERMINATION**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING THE ITASCA COUNTY RPM AND CATHERINE MCLYNN

On March 23, 2026, the Campaign Finance and Public Disclosure Board received a complaint submitted by Troy Scheffler regarding the Itasca County RPM, which is a political party unit registered with the Board,¹ and its treasurer, Catherine McLynn. The complaint also refers to Senator Keri Heintzeman and her principal campaign committee, Heintzeman (Keri) for Senate.²

The complaint notes that within its 2025 pre-primary report of receipts and expenditures, the Itasca County RPM reported making a contribution of \$5,000 to the Heintzeman committee on April 18 and reported receiving a contribution of \$1,100 from the Heintzeman committee on May 17, 2025. Those transactions were reported in the same manner within the Itasca County RPM's original 2025 year-end report, and the Itasca County RPM also reported making an additional \$1,000 contribution to the Heintzeman committee on December 2, 2025. The complaint notes that the Heintzeman committee filed a large contribution notice with the Board on April 18, 2025, disclosing a \$5,000 contribution received from the Itasca County RPM.

The complaint notes that within its special election cycle final report, filed May 26, 2025, the Heintzeman committee reported that the contribution it received from the Itasca County RPM on April 18, 2025, was for \$3,900 rather than \$5,000. The complaint notes that the Itasca County RPM filed an amended 2025 year-end report on March 18, 2026, which states that the contribution made to the Heintzeman committee in April 2025 was for \$3,900 rather than \$5,000, and omits the \$1,100 receipt previously reported as a contribution received from the Heintzeman committee in May 2025.

The complaint alleges that the Itasca County RPM's original 2025 year-end report is accurate, and that it was amended "because the \$5,000 contribution, combined with other party unit contributions, pushed the Heintzeman committee over the \$10,000 aggregate party unit limit." The complaint alleges that Ms. McLynn certified the first amended 2025 year-end report of the Itasca County RPM as true despite knowing that it was false, "to conceal a contribution limit violation by Senator Keri Heintzeman."

The complaint states that the "Itasca County RPM paid \$3,600 to Lamar Advertising" for "three separate billboard panels at two locations on the major highways through Grand Rapids". The complaint includes photographs of the billboards, which included the following text:

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/party-unit/20213/2026/

² cfb.mn.gov/reports-and-data/viewers/campaign-finance/candidates/19205/

SPECIAL ELECTION
MN. SENATE DISTRICT 06
VOTE REPUBLICAN EARLY
 PRIMARY • APRIL 15
 GENERAL • APRIL 29
PREPARED & PAID FOR BY THE ITASCA COUNTY RPM

The complaint notes that the Itasca County RPM reported the expense as a general expenditure described as “Advertising - Billboard: Vote Republican SD6”. The complaint asserts that the Itasca County RPM’s campaign finance reports are inaccurate because the text displayed on the billboards was “a substantially more specific message than ‘Vote Republican SD6.’” The complaint contends that the description provided within the party unit’s reports “suggests a single billboard” rather than three. The complaint argues that the failure to include the text of the billboard within the text of the party unit’s campaign finance reports is material because it obscures “the billboard’s explicit connection to a specific election and its directive to voters regarding both the primary and general elections.”

The complaint also asserts that the expense was an independent expenditure or an approved expenditure because “After April 15, when Keri Heintzeman won the primary, she was the sole Republican nominee in the Senate District 6 general election.” The complaint asserts that after the special primary, “There was exactly one Republican to vote for. The billboard identified her by method of elimination.”

Determination

Reporting and false certification regarding contribution to Heintzeman committee

Minnesota Statutes section 10A.20, subdivision 3, paragraphs (c) and (k), require campaign finance reports filed with the Board to include the name and address “of each individual or association that has made one or more contributions to the reporting entity . . . together with the amount and date of each contribution” and “the name, address, and registration number if registered with the board of each . . . principal campaign committee, local candidate, or party unit to which contributions have been made that aggregate in excess of \$200 within the year and the amount and date of each contribution.” Minnesota Statutes section 10A.025, subdivision 2, paragraph (b), provides that “An individual shall not sign and certify to be true a report or statement knowing it contains false information or knowing it omits required information.”

The complaint describes a discrepancy with respect to how the Itasca County RPM originally reported the \$5,000 it paid to the Heintzeman committee in April 2025 and the return of \$1,100 of that amount, versus how the Heintzeman committee reported that same contribution within its special election cycle final report and how the Itasca County RPM reported that contribution within its first amended 2025 year-end report. As the complaint acknowledges, “The context of this transaction makes clear that the \$1,100 was a return of excess contributions, not a genuine

contribution from the Heintzeman campaign to Itasca County RPM.” The complaint likewise states that “The Heintzeman committee sent \$1,100 back to Itasca approximately one month after receiving \$5,000 because the \$5,000 contribution, combined with other party unit contributions, pushed the Heintzeman committee over the \$10,000 aggregate party unit limit.”³

A contribution may be returned, in full or in part, within 90 days of deposit under Minnesota Statutes section 10A.15, subdivision 3.⁴ A contribution returned within 90 days of deposit is not deemed accepted. When a candidate receives a contribution that, if accepted, would cause a contribution limit to be exceeded but they wish to accept a portion of it, Board staff instruct them to report receiving only the amount of the contribution that was permissible and to not report accepting or returning the remainder, as long as the excess amount is returned within 90 days of deposit, as permitted by statute. When a contribution is partially returned to a contributor that is registered with the Board within 90 days of deposit, Board staff likewise instruct the contributor to report giving only the amount of the contribution that was not returned so that the reports filed by each entity will match and accurately reflect only the portion of the contribution that was accepted pursuant to Minnesota Statutes section 10A.15, subdivision 3. To the extent that amendments are needed to resolve discrepancies, the Board generally only requires that the filer’s year-end report, or last report covering the reporting period in question, be amended.

The complaint does not include evidence indicating that the Itasca County RPM’s first amended 2025 year-end report was false with respect to the contribution made to the Heintzeman committee, let alone that the party unit’s treasurer, Ms. McLynn, knew it was false when the report was certified as true. To the contrary, the complaint includes evidence that the Itasca County RPM properly filed an amended report after becoming aware of a discrepancy between its report and that filed by the Heintzeman committee.⁵

Based on the foregoing analysis, the complaint does not state a prima facie violation of Minnesota Statutes sections 10A.025, subdivision 2, or 10A.20, subdivision 3.

Reporting regarding billboards

Minnesota Statutes section 10A.01, subdivision 4, provides that:

"Approved expenditure" means an expenditure made on behalf of a candidate or a local candidate by an entity other than the candidate's principal campaign committee or the local candidate, if the expenditure is made with the authorization or expressed or implied consent of, or in cooperation or in concert with, or at the request or suggestion of the candidate or local candidate, the candidate's principal campaign committee, or the candidate's or local candidate's agent.

³ See [Minn. Stat. § 10A.27, subd. 2.](#)

⁴ See *also* [Minn. Stat. § 10A.15, subd. 3a](#) (allowing a facially-excessive contribution to be deposited if, “at the time of deposit, the treasurer issues a check to the source for the amount of the excess).

⁵ See [Minn. Stat. § 10A.025, subs. 4-5.](#)

The complaint does not include evidence supporting the contention that the cost of the billboards may have been an approved expenditure. The complaint alternatively contends that the cost of the billboards was an independent expenditure. Minnesota Statutes section 10A.01, subdivision 18, provides that:

"Independent expenditure" means an expenditure expressly advocating the election or defeat of a clearly identified candidate or local candidate, if the expenditure is made without the express or implied consent, authorization, or cooperation of, and not in concert with or at the request or suggestion of, any candidate or any candidate's principal campaign committee or agent or any local candidate or local candidate's agent.

Minnesota Statutes section 10A.01, subdivision 16a, provides in part that the term "expressly advocating" means that a communication . . . clearly identifies a candidate" or contains "advocacy of the election or defeat of one or more clearly identified candidates. . . ."

Minnesota Statutes section 10A.275 provides that when made by a party unit, "expenditures on behalf of candidates of that party generally without referring to any of them specifically in a published, posted, or broadcast advertisement" "are not considered contributions to or expenditures on behalf of a candidate for the purposes of section 10A.25 or 10A.27 and must not be allocated to candidates under section 10A.20, subdivision 3, paragraph (h)". Section 10A.20, subdivision 3, paragraph (h), addresses the reporting of both approved expenditures and independent expenditures.

The term "clearly identified" is not defined within Minnesota Statutes Chapter 10A or the Board's administrative rules for purposes of the definition of "expressly advocating" under Minnesota Statutes section 10A.01, subdivision 16a. In the context of electioneering communications, Minnesota Statutes section 10A.201, subdivision 10, provides the following definition:

"Refers to a clearly identified candidate" means that the candidate's name, nickname, photograph, or drawing appears, or the identity of the candidate is otherwise apparent through an unambiguous reference such as "the governor," "your legislator," or "the incumbent," or through an unambiguous reference to the candidate's status as a candidate such as "the [political party] gubernatorial nominee" or "the [political party] candidate for senate."⁶

For purposes of independent expenditures federal law defines the term "clearly identified" to mean that "(A) the name of the candidate involved appears; (B) a photograph or drawing of the candidate appears; or (C) the identity of the candidate is apparent by unambiguous reference." 52 U.S.C. § 30101 (18). Code of Federal Regulations Title 11, section 100.17, further defines the term as follows:

⁶ This definition closely mirrors [11 C.F.R. § 100.29 \(b\) \(2\)](#), which applies to electioneering communications, and is also similar to [11 C.F.R. § 100.17](#), which applies to independent expenditures.

The term *clearly identified* means the candidate's name, nickname, photograph, or drawing appears, or the identity of the candidate is otherwise apparent through an unambiguous reference such as “the President,” “your Congressman,” or “the incumbent,” or through an unambiguous reference to his or her status as a candidate such as “the Democratic presidential nominee” or “the Republican candidate for Senate in the State of Georgia.”

In 1976 the United States Supreme Court held that constitutional vagueness problems involving a limit on independent expenditures could be avoided only by reading a federal statute to be “limited to communications that include explicit words of advocacy of election or defeat of a candidate, much as the definition of ‘clearly identified’ . . . requires that an explicit and unambiguous reference to the candidate appear as part of the communication.” *Buckley v. Valeo*, 424 U.S. 1, 43 (1976) (explaining, in footnote 51, that the statute “defines ‘clearly identified’ to require that the candidate's name, photograph or drawing, or other unambiguous reference to his identity appear as part of the communication. Such other unambiguous reference would include use of the candidate's initials (e. g., FDR), the candidate's nickname (e. g., Ike), his office (e. g., the President or the Governor of Iowa), or his status as a candidate (e. g., the Democratic Presidential nominee, the senatorial candidate of the Republican Party of Georgia).”).⁷

The complaint includes photographs demonstrating that the billboards did not include any candidate’s name or likeness. Therefore, they clearly identified a candidate only if they unambiguously referred to a specific candidate by other means. The Itasca County RPM’s 2025 year-end report indicates that the billboards were purchased at a time when there were eight Republican candidates competing in the special primary. A party unit cannot be expected to predict the future when making an expenditure in advance of a special election with an eight-way Republican special primary in order to know which candidate its expenditure will be deemed to support. The text “VOTE REPUBLICAN EARLY” accompanied by text listing the dates of a special primary and a special election in a specific Senate district does not unambiguously refer to a specific candidate. Therefore, the complaint does not include evidence supporting the conclusion that the billboards “clearly identified” any candidate.

Minnesota Statutes section 10A.20, subdivision 3, paragraph (h), requires campaign finance reports filed with the Board to include the name and address “of each individual or association to whom aggregate expenditures . . . have been made by or on behalf of the reporting entity within the year in excess of \$200, together with the amount, date, and purpose of each expenditure, including an explanation of how the expenditure was used. . . .” The explanation provided within a campaign finance report regarding an expenditure that communicates information to the public will almost invariably contain less detail than the communication itself. When a treasurer reports an expense, they are required to select from a list of descriptions, with one being “Advertising - Billboard”. In most instances they are required to provide further explanation within a text field. In this instance, the Itasca County RPM’s reports include the

⁷ The Court held that even as narrowly construed, the limit was unconstitutional for reasons other than vagueness. See *FEC v. Wisconsin Right To Life, Inc.*, 551 U.S. 449, 486-87 (2007).

most applicable description and further explain “how the expenditure was used” by including the text “Vote Republican SD6”. The contention that reports disclosing expenditures for communications regarding an election are required to include the text of the communication or identify the election to which they pertain is not supported by Minnesota Statutes section 10A.20, subdivision 3. The Itasca County RPM’s reports accurately identify the expenditure as related to billboard advertising in Senate District 6 asking viewers to vote Republican. No further detail was required.

Based on the forgoing analysis, the complaint does not provide evidence that the expenditure for billboards was an approved expenditure or an independent expenditure, and the complaint does not state a prima facie violation of Minnesota Statutes section 10A.20, subdivision 3, with respect to the reporting of the expenditure for the billboards.

Pursuant to Minnesota Statutes section 10A.022, subdivision 3, this prima facie determination is made by the Board chair and not by any vote of the entire Board. The complaint is dismissed without prejudice.



David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: April 2, 2026

CONFIDENTIAL

STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD

In the Matter of the Complaint of
Troy Scheffler Regarding the
Itasca County RPM and Catherine McLynn
(Registration No. 20213)

**Motion and Affidavit for
Proceeding In Forma Pauperis in the
Court of Appeals**

APPELLATE CASE #:
CFB CASE FILED: 03/23/2026
DATE OF DECISION: **04/02/2026**

State of Minnesota)
) SS
County of Crow Wing)

1. I believe that I have valid reasons for pursuing this Court of Appeals action and I move for an order granting me the following relief: Waiving appellate court filing fees and cost bond.

2. I am a party in this action and in good faith I request an Order to proceed In Forma Pauperis. I have attached a copy of my statement of the case or petition being filed in the appellate court, showing the proposed issues on appeal.

3. I am receiving public assistance under one or more of the following programs: Medicare Part B reimbursement, see MN Stat. 256B .057 subd.4. (Attached)

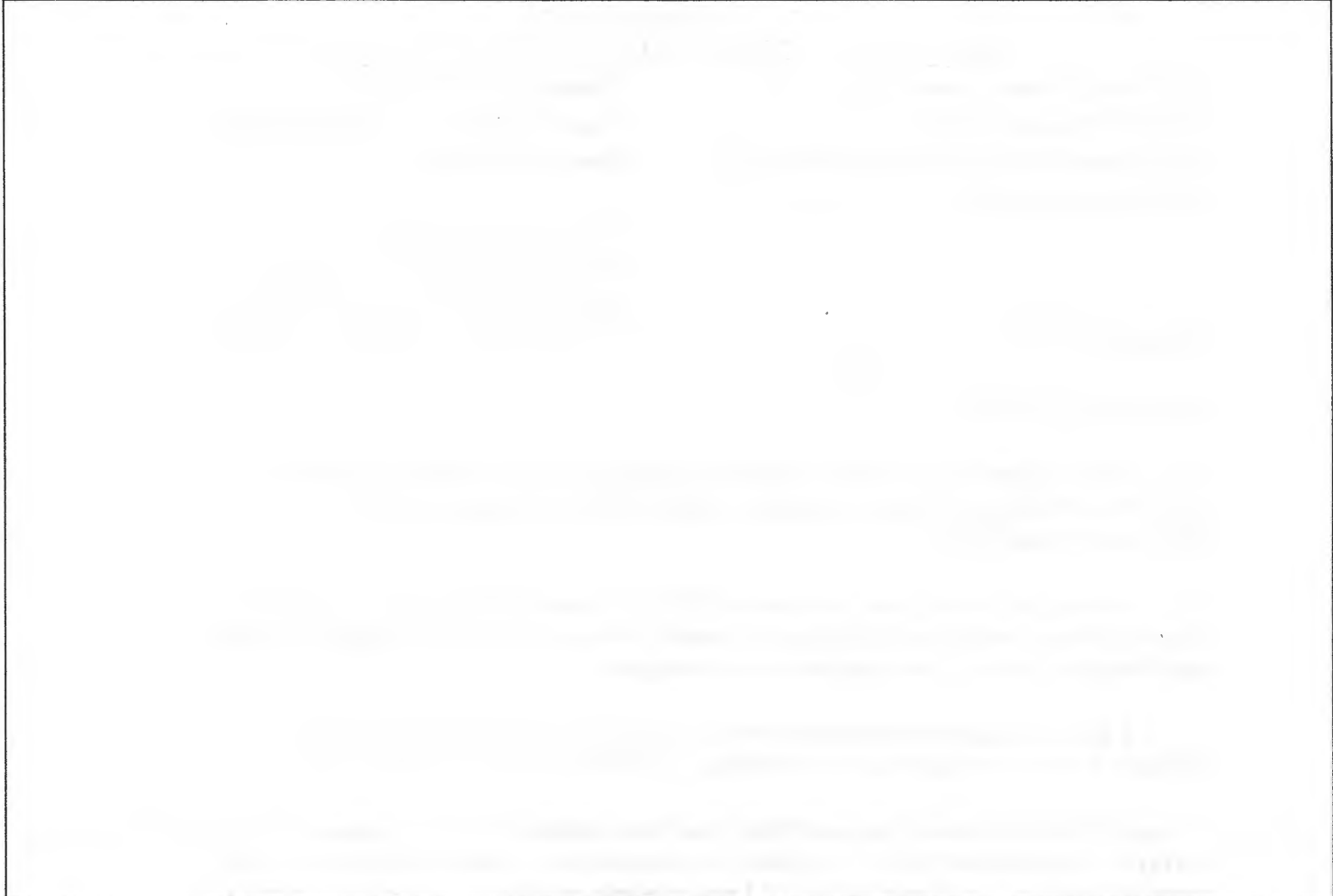
By signing this Affidavit, I am certifying that these statements are true under penalty of perjury. I understand that if I provide false information on the form it may lead to criminal charges. I understand that if I provide information or requested records may result in denial of my motion to proceed In Forma Pauperis. I am authorizing that the facts contained in this Affidavit may be verified by any means required.

/s/ **Troy Scheffler**
Troy Scheffler
26359 Shandy Trl.
Merrifield, MN 56465
763-225-7702
troyscheffler@gmail.com

04/13/2026



INVOICE DATE	INVOICE NUMBER	DESCRIPTION	INVOICE AMOUNT
04/01/2026	10-Apr	MED PART B HS Service Date: HS Desc:	\$202.90



Vendor No.	Vendor Name	EFT No.	EFT Date	EFT Amount
	TROY K SCHEFFLER		04/10/2026	\$202.90



Crow Wing County Community Services

PO Box 686
Brainerd, MN 56401
PH. (218) 824-1047

Vendor
Number



EFT
Date

04/10/2026

EFT
Number



\$202.90

Pay Two Hundred Two Dollars and 90 Cents

To the Order Of TROY K SCHEFFLER
26359 SHANDY TRAIL
MERRIFIELD, MN 56465

**EFT FILE COPY
NON-NEGOTIABLE**

FILED

STATE OF MINNESOTA
IN COURT OF APPEALS

April 14, 2026

In the Matter of the Complaint of
Troy Scheffler Regarding the
Itasca County RPM and Catherine McLynn
(Registration No. 20213)

**STATEMENT OF THE CASE OF
RELATOR**

APPELLATE CASE #:
CFB CASE FILED: 03/23/2026
DATE OF DECISION: **04/02/2026**

1. **Agency where case originated:** Minnesota Campaign Finance and Public Disclosure Board.

Name of presiding judge or hearing officer: Chair, David Asp

2. **Jurisdictional statement for a certiorari appeal:** MN Stat: 14.63, 14.64

Authority fixing time limit and date of event triggering appeal time; mailing notice of final order 04/02/2026: MN Stat. 14.63, 14.64

3. **Type of litigation and any statutes at issue:**

Respondent Itasca County RPM filed a false amended campaign finance report in violation of Minn. Stat. § 10A.025, subd. 2, misclassified a billboard expenditure that identified a specific election and candidate in violation of Minn. Stat. § 10A.20, subd. 3, and reported an inaccurate expenditure description for the billboard. Respondent Catherine McLynn, as treasurer, certified the amended report as true despite knowing it was false.

4. **Brief description of issues that were raised before the administrative or agency decision maker, and how the administrative or agency decision maker decided those issues:**

ISSUES RAISED:

§ 10A.025, subd. 2 — Itasca County RPM’s original 2025 year-end report, certified January 5, 2026, reported a \$5,000 contribution to the Heintzeman committee and a \$1,100 return from the Heintzeman committee. On March 18, 2026—sixteen days after the Board Chair’s prima facie determination in the related Heintzeman complaint and after the discrepancy was exposed—the Itasca County RPM filed an amended report changing the contribution to \$3,900 and deleting the \$1,100 return entirely. § 10A.20, subd. 3 — The \$3,600 billboard expenditure paid to Lamar Advertising was reported on Schedule B1 as generic “billboard advertising” rather than on Schedule B3A as an

approved or independent expenditure. The billboard text read: “SPECIAL ELECTION / MN. SENATE DISTRICT 06 / VOTE REPUBLICAN EARLY / PRIMARY • APRIL 15 / GENERAL • APRIL 29.” § 10A.27, subd. 2 — The contribution reporting discrepancy, combined with the post-complaint amendment, evidences a scheme to conceal that contributions to the Heintzeman committee exceeded the \$10,000 aggregate party unit limit.

HOW DECIDED:

Dismissed without prejudice. Board ruled:

Amended report resolved the contribution discrepancy; deferred to “routine reconciliation” under § 10A.025, subd. 5. No prima facie violation of § 10A.025, subd. 2.

Billboard was not an approved or independent expenditure because eight candidates appeared on the primary ballot; expenditure description “billboard advertising” was sufficient under § 10A.20, subd. 3. No prima facie violation of § 10A.20, subd. 3, or § 10A.27, subd. 2.

5. Short description of issues you are raising in this appeal:

The Board erred by treating the Itasca County RPM’s post-complaint amended report as a legitimate correction rather than evidence of a false certification. The original report was certified as true on January 5, 2026, and amended only after the complainant exposed the discrepancy. The Board deferred to “routine reconciliation” rather than evaluating whether the treasurer knowingly certified a false report under Minn. Stat. § 10A.025, subd. 2.

The Board erred by finding the billboard was not an approved or independent expenditure based solely on the number of primary candidates, ignoring that the billboard identified the specific election, the specific district, and urged early voting through the general election—at which point only one Republican candidate remained. The Board further erred by finding that “billboard advertising” satisfied § 10A.20, subd. 3, when the actual billboard text identified election dates and urged voters to “VOTE REPUBLICAN.”

The Board applied the wrong standard at the prima facie stage, conducting a merits analysis rather than accepting the complaint’s allegations as true, and Chair Asp should have recused himself given his role as defense counsel in the foundational *Gadsden v. Kiffmeyer* precedent.

Relator seeks review of the entire Prima Facie Determination.

6. **Related appeals:**

a. List any prior or pending appeals arising from the same agency case as this appeal: None.

b. List any pending appeals arising from different agency cases that raise similar issues to this appeal: None known.

7. **Contents of record:**

a. Is a transcript necessary to review the issues on appeal? No.

b. If yes, is it a full transcript of the hearing(s) before the administrative decision-maker, or a partial transcript? N/A

c. Has the transcript been ordered from the court reporter? N/A.

d. If a transcript is unavailable, is a statement of the proceedings under Minnesota Rules of Civil Appellate Procedure 110.03 necessary? N/A.

e. In lieu of the record as defined in Minnesota Rules of Civil Appellate Procedure 110.01, have the parties agreed to prepare a statement of the record pursuant to Minnesota Rules of Civil Appellate Procedure 110.04? No.

8. **Oral argument:**

a. If you have an attorney, is oral argument requested? No.

b. N/A

9. **Type of Brief to be filed:**

Informal Brief under Rule 128.01, subd. 1.

10. **Names, addresses, and telephone numbers of relator and respondents:**

Relator:

/s/ **Troy Scheffler**
Troy Kenneth Scheffler
26359 Shandy Trl, Merrifield, MN 56465
troyscheffler@gmail.com
763-225-7702

04/13/2026

Respondent Itasca County RPM and Catherine McLynn (Registration No. 20213)

931 North Pokegama Ave
Grand Rapids, MN 55744

Respondent Campaign Finance and Public Disclosure Board:
Nathan J. Hartshorn, Assistant Attorney General (MN#0320602)
445 Minnesota Street, Suite 600
St. Paul, Minnesota 55101-2134
(651) 757-1252

**STATE OF MINNESOTA
CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD**

**ORDER ON MOTION TO
PROCEED IN FORMA PAUPERIS**

IN THE MATTER OF THE COMPLAINT OF TROY SCHEFFLER REGARDING THE ITASCA COUNTY RPM AND CATHERINE MCLYNN

On March 23, 2026, the Campaign Finance and Public Disclosure Board received a complaint submitted by Troy Scheffler regarding the Itasca County RPM, which is a political party unit,¹ and its treasurer, Catherine McLynn. The complaint alleged violations of the reporting requirements for campaign finance reports and the prohibition on falsely certifying the accuracy of reports filed with the Board. The Board's chair made a prima facie determination dismissing the complaint on April 2, 2026.

Mr. Scheffler filed a petition for a writ of certiorari with the Court of Appeals on April 14, 2026, seeking judicial review under Minnesota Statutes section 14.63. On April 13, 2026, Mr. Scheffler mailed his Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals to the Board by certified mail, along with his Statement of the Case.

The affidavit states that Mr. Scheffler is receiving public assistance, consisting of "Medicare Part B reimbursement". The affidavit includes a document indicating that Mr. Scheffler received a \$202.90 reimbursement on April 10, 2026, from Crow Wing County Community Services, related to Medicare Part B. In 2026 the standard monthly premium for Medicare Part B insurance is \$202.90.² Minnesota Statutes section 563.01, subdivision 3, paragraph (b), provides that if an "appeal is not of a frivolous nature," an individual seeking to proceed *in forma pauperis* is generally presumed to qualify if they receive "public assistance described in section 550.37, subdivision 14. . . ." Minnesota Statutes section 550.37, subdivision 14, provides that "government assistance based on need includes but is not limited to . . . payment of Medicare part B premiums. . . ."

The Statement of the Case asserts:

The Board erred by treating the Itasca County RPM's post-complaint amended report as a legitimate correction rather than evidence of a false certification.³ The original report was certified as true on January 5, 2026, and amended only after the complainant exposed the discrepancy. The Board deferred to "routine

¹ cfb.mn.gov/reports-and-data/viewers/campaign-finance/party-unit/20213/

² cms.gov/newsroom/fact-sheets/2026-medicare-parts-b-premiums-deductibles

³ The amendments in question were made within an amended 2025 year-end report of receipts and expenditures filed with the Board on March 18, 2026, which was several days prior to the Board receiving the complaint.

reconciliation” rather than evaluating whether the treasurer knowingly certified a false report under Minn. Stat. § 10A.025, subd. 2.

The Board erred by finding the billboard was not an approved or independent expenditure based solely on the number of primary candidates, ignoring that the billboard identified the specific election, the specific district, and urged early voting through the general election—at which point only one Republican candidate remained. The Board further erred by finding that “billboard advertising” satisfied § 10A.20, subd. 3, when the actual billboard text identified election dates and urged voters to “VOTE REPUBLICAN.”

The Board applied the wrong standard at the prima facie stage, conducting a merits analysis rather than accepting the complaint’s allegations as true, and Chair Asp should have recused himself given his role as defense counsel in the foundational *Gadsden v. Kiffmeyer* precedent.⁴

Based on the above background and the record in this matter, the Board makes the following:

Findings of Fact

1. On March 23, 2026, the Campaign Finance and Public Disclosure Board received a complaint filed by Troy Scheffler regarding the Itasca County RPM and its treasurer, Catherine McLynn. The complaint alleged violations of reporting requirements for campaign finance reports under Minnesota Statutes section 10A.20, subdivision 3, and the prohibition on falsely certifying the accuracy of reports filed with the Board under Minnesota Statutes section 10A.025, subdivision 2.
2. On April 2, 2026, the Board’s chair determined that the complaint did not state a prima facie violation of those statutes pursuant to Minnesota Statutes section 10A.022, subdivision 3, paragraph (c).
3. On April 13, 2026, Mr. Scheffler filed his Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals by mailing it, with his Statement of the Case, to the Board. The affidavit indicates that Mr. Scheffler receives public assistance in the form of payment of Medicare Part B premiums. The Statement of the Case describes the appeal as being based, in part, on the assertions that the Board’s chair erred in determining that the complaint lacked evidence indicating that the Itasca County RPM’s treasurer falsely certified a campaign finance report filed with the Board, and in determining that the complaint lacked evidence indicating that the Itasca County RPM’s 2025 year-end report of receipts and expenditures was inaccurate with respect to the reporting of an expenditure for billboards.

⁴ In *Gadsden v. Kiffmeyer*, OAH Docket No. 3-0320-21609, Findings of Fact, Conclusions and Order (Nov. 1, 2010), available at 2010 WL 4963157, a panel of administrative law judges determined that a respondent did not violate the disclaimer requirement for campaign material under Minnesota Statutes section 211B.04. While that decision includes discussion regarding certain provisions within Minnesota Statutes Chapter 10A, it does not address the specific reporting requirements involved in this matter.

Based on the above findings of fact, the Board makes the following:

Conclusions of Law

1. Based on the Statement of the Case, at least some of the issues raised in this appeal are not frivolous.
2. Mr. Scheffler meets the criteria for proceeding *in forma pauperis*.

Based on the above findings of fact and conclusions of law, the Board issues the following:

Order

1. The Motion to Proceed In Forma Pauperis is granted.

David Asp, Chair
Campaign Finance and Public Disclosure Board

Date: _____

**CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD
MAY 2026**

ACTIVE FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	African Community Economic Development/Abdulkadir Y. Hussein, CEO	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025	10/16/25			
	JADT Development Group LLC	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/22/2025	11/17/25	6/20/26		
Omar Jamal, Lobbyist	Omar Jamal, Lobbyist Principal and Association	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				Required reports filed. Lobbyist and principal intend to submit waiver request concerning penalties and fees. Case on hold at staff request.
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/21/2025				
		Lobbyist Disbursement Report 1/1/2024 to 5/31/2024	\$1,000 LFF \$1,000 CP	7/21/2025				
		Lobbyist Activity report 1/15/2025	\$250 LFF	7/21/2025				

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Filing Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Ka Joog Nonprofit Organization	Late filing of 2019 Annual Report of Lobbyist Principal	\$475 LFF	7/21/2025	12/9/25			
		Late filing of 2021 Annual Report of Lobbyist Principal	\$25 LFF	7/21/2025				
		Late filing of 2023 Annual Report of Lobbyist Principal	\$125 LFF	7/21/2025				
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025				
	Kyros	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1,000 CP	7/21/2025	1/2/26			Staff seeking arranged payment
	Twin Cities Health Services/Gulad Mohamoud, CEO	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/21/2025	12/8/25 (on Secretary of State)			
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/21/2025				
	Twin Cities Therapy Services Inc./Gulad Mohamoud, CEO	2024 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/21/2025	12/8/25 (on Secretary of State)			
		Late filing of 2024 of Lobbyist Principal Report	\$1,000 LFF	7/21/2025				

CLOSED FILES

Candidate/Treasurer/ Lobbyist	Committee/Agency	Report Missing/ Violation	Late Fee/ Civil Penalty	Referred to AGO	Date S&C Personally Served	Default Hearing Date	Date Judgment Entered	Case Status
	Newby Co. d/b/a Cultivated CBD	2023 Annual Report of Lobbyist Principal	\$1,000 LFF \$1000 CP	7/18/2025	9/18/25	4/29/26	4/30/26	
		2024 Annual Report of Lobbyist Principal	\$1,000 LFF	7/18/2025				

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